

**EPA Reg. No. 42750-23**  
**Vol. 2**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Mr. Morris Gaskins  
Albaugh, Inc.  
P.O. Box 2127  
Valdosta, GA 31604

JAN 11 2011

Dear Mr. Gaskins:

Subject: MCPA Ester 4  
Review of Basic and Alternates #1, #2, #3, #4, #5, #6, and #7 CSFs  
EPA Registration No. 42750-23  
Submission Dated: December 9, 2010

The amendment referred to above, submitted in connection with registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA), as amended is acceptable.

The basic CSF (dated 03/11/11) is acceptable and has been added to your records as current and updated and must supersede all other basic CSFs on file.

Alternates #1, #2, #3, #4, #5, #6, and #7 (all dated 12/9/10) have been added to your record as current and updated.

Sincerely,

*Michael Walsh*

Kathryn V. Montague *for*  
Product Manager (23)  
Herbicide Branch  
Registration Division (7505P)



# Material to be added to an e-Jacket/Jacket

Reg. No. 42750-23

Description: NEW CSF

1. ☒ Placement within the e-Jacket/jacket:
- ☒ Default: (chronological, top = newest)
  - ☐ File Location: (PDF page number, i.e., "before page 45")

2. ☒ Send to Data Extraction contractors this material:

- ☐ Newly stamped accepted label
- ☐ Notification
- ☒ New CSF
- ☐ Other: \_\_\_\_\_

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Juanita Gilchrist

Phone: 305-6959 Division: RD/HB

Date: 2/1/11



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Mr. Morris Gaskikns  
Albaugh, Inc.  
P.O. Box 2127  
Valdosta, GA 31604

FEB -

Dear Mr. Gaskins:

Subject: MCPA Ester 4  
Alternate #1 Confidential Statement of Formula (CSF)  
EPA Registration No. 42750-23  
Submission Dated: November 2, 2010

The amendment referred to above, submitted in connection with registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA), as amended is acceptable.

The alternate #1 CSF (dated 11/02/10) is acceptable and has been added to your record as current and updated.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathryn V. Montague".

Kathryn V. Montague  
Product Manager (23)  
Herbicide Branch  
Registration Division (7505P)



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 42750-23	2. EPA Product Manager K. Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) MCPA Ester 4	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Submission of proposed amended CSFs to add additional technical suppliers

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
				Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2.5 gal, 30 gal, bulk		5. Location of Label Directions <input checked="" type="checkbox"/> On label attached to container	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Morris Gaskins	Title Registrations Manager	Telephone No. (Include Area Code) 229-244-3288	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			8. Date Application Received (Stamp) ..... ..... .....
2. Signature 	3. Title Registrations Manager		
4. Typed Name Morris Gaskins	5. Date December 9, 2010		



**CORPORATE OFFICE**  
1525 NE 36th Street  
Ankeny, IA 50021  
515.964.9444 (Phone)  
800.247.8013 (Toll Free)  
515.964.7813 (FAX)

# ALBAUGH, INC.

**GEORGIA OFFICE**  
P.O. Box 2127  
Valdosta, GA 31604-2127  
229.244.3288 (Phone)  
229.244.5841 (FAX)

FED-X

December 9, 2010

Document Processing Desk (AMEND)  
Ms. Kathryn Montague (PM 23)  
Registration Division (7504P)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
One Potomac Yard (South Bldg)  
2777 South Crystal Dr.  
Arlington, VA 22202

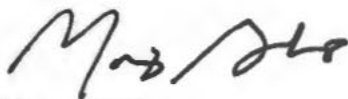
RE: MCPA Ester 4  
EPA Reg. No. 42750-23

Dear Ms. Montague,

The enclosed submission is proposed amendments to the basic and alternate CSFs for the above referenced registration. Albaugh would like to revise the basic CSF to reflect the technical registration transfer earlier this year from Nufarm to Albaugh and also add additional technical sources and within those allow the use of [REDACTED]

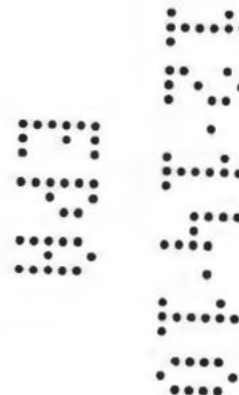
Please call if you have any questions.

Regards,



Morris Gaskins  
Registrations Manager  
Albaugh, Inc.

\*Inert ingredient information may be entitled to confidential treatment\*



PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS  
[www.albaughinc.com](http://www.albaughinc.com)

**CORPORATE OFFICE**  
1525 NE 36th Street  
Ankeny, IA 50021  
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# ALBAUGH, INC.

**GEORGIA OFFICE**  
P.O. Box 2127  
Valdosta, GA 31604-2127  
229.244.3288 (Phone)  
229.244.5841 (FAX)

FED-X

November 2, 2010

Document Processing Desk (AMEND)  
Ms. Kathryn Montague (PM 23)  
Registration Division (7504P)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
One Potomac Yard (South Bldg)  
2777 South Crystal Dr.  
Arlington, VA 22202

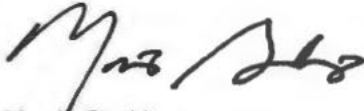
RE: MCPA Ester 4  
EPA Reg. No. 42750-23

Dear Ms. Montague,

The enclosed submission for the above referenced product is final alternate CSF # 1 to correct errors noted in the Agency's comment letter dated October 28, 2010.

Please call if you have any questions.

Regards,



Morris Gaskins  
Registrations Manager  
Albaugh, Inc.



PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS  
[www.albaughinc.com](http://www.albaughinc.com)





United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 42750-23	2. EPA Product Manager K. Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) MCPA Ester 4	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>10/28/10</u>	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Submission of corrected Alternate CSF # 1 in response to Agency comment letters dated October 28, 2010

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input checked="" type="checkbox"/> On label attached to container	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Morris Gaskins	Title Registrations Manager	Telephone No. (Include Area Code) 229-244-3288	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment both under applicable law.			6. Date Application Received (Stamped)  
2. Signature 	3. Title Registrations Manager		
4. Typed Name Morris Gaskins	5. Date November 2, 2010		

# Material to be added to an e-Jacket/Jacket

Reg. No. 42750-23 Dec # 1435246

Description: AA-CSF

1. ☒ Placement within the e-Jacket/jacket:

☒ Default: (chronological, top = newest)

☐ File Location: (PDF page number, i.e., "before page 45")

2. ☒ Send to Data Extraction contractors this material:

☐ Newly stamped accepted label

☐ Notification

☒ New CSF

☐ Other: \_\_\_\_\_

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Juanita Gilchrist

Phone: 305-6959 Division: RD / HB

Date: 10/28/10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Mr. Morris Gaskins  
Registrations Manager  
Albaugh Inc.  
P.O. Box 2127  
Valdosta, GA 31604

Dear Mr. Gaskins:

Subject: MCPA Ester 4  
Review of Alternate #1 Confidential Statement of Formula (CSF)  
EPA Registration No. 42750-23  
Submission Dated: July 30, 2010

The amendment referred to above, submitted in connection with registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA), as amended are acceptable with comment.

On row one, box 12, replace Reg. No. 15440-9 with Reg. No. 42750-214 and resubmit the revised CSF to the Agency for review. Reg. No. 15440-9 was transferred to Reg. No. 42750-214 on 05/18/10.

The alternate #1 CSF (dated 07/30/10) is acceptable with comment and has been added to your record as current and updated.

Sincerely,

A handwritten signature in black ink, which appears to read "Kathryn V. Montague", is written over the typed name.

Kathryn V. Montague  
Product Manager (23)  
Herbicide Branch  
Registration Division (7505P)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

September 21, 2010

Mr. Morris Gaskins  
Registrations Manager  
ALABAUGH, INC.  
P.O. Box 2127  
Valdosta, GA 31604

Subject: CSF Notification

Dear Mr. Gaskins:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 10/15/09 for **EPA Registration 42750-23**. The Registration Division (RD) has conducted a review of the Confidential Statement of Formula (CSF) submitted with this request for its applicability under PRN 98-10 and finds that the change(s) requested falls within the scope of PRN 98-10. Therefore, the alternate CSF dated 10/15/09 is **acceptable**. A copy of the CSF has been added to the registration file for the subject product.

If you have any questions, please contact me via telephone at 703-308-8893 or e-mail ([hobgood.sherada@epa.gov](mailto:hobgood.sherada@epa.gov)).

Sincerely,

/s/

Sherada D. Hobgood  
Notifications Review Coordinator  
Registration Division (7505P)  
Office of Pesticide Programs

Receipt for Section 3

S: 879612

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Amendment

Billable: ☐ Yes ☒ No

Company: 42750 ALBAUGH INC

V

Risk Manager: Registration Division, Risk Management Team 23

Product #: 42750-23

Product Name: MCPA ESTER 4

Override#:

Me Too Section3:

Me Too Product Name:

Application Date: 30-Jul-2010

OPP Rec'vd Date: 02-Aug-2010

Front End Date: 02-Aug-2010

Risk Manager Send Date: 03-Aug-2010

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

submission of proposed alternate CSF # 1 to add alternate surfactant system

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

New Ingredient Request Date:

New Ingredient Received Date:

Receipt Content

Des

CSF

View/Edit

Print Letter

Enter More Information

Tracking



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

August 3, 2010

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

GREG MULHALL  
ALBAUGH INC  
1525 NE 36TH STREET  
ANKENY, IA 50021

PRODUCT NAME: MCPA ESTER 4  
COMPANY NAME: ALBAUGH INC  
OPP IDENTIFICATION NUMBER:  
EPA FILE SYMBOL: 42750-23  
EPA RECEIPT DATE: 08/02/10

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 23, at (703) 305-1243.

Sincerely,

*P.K. Thorne*  
Front End Processing Staff  
Information Services Branch  
Information Technology & Resources Management Division

# Fee for Service

{879612.~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies?      ☐ Fee Waiver?
- ☐ volpay    % Reduction: \_\_\_\_

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 23

Receipt No.

S-

879612

EPA File Symbol/Reg. No.

42750-23

Pin-Punch Date:

8/2/2010

☒ This item is NOT subject to FFS action.

## Action Code:

Requested:

Granted:

Amount Due: \$ \_\_\_\_

## Parent/Child Decisions:

*Inerts approved: S. Rock 8/5/10*

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer:

*Al B. D.*

Date: 8-3-10

Remarks:

# FAST-TRACK AMENDMENTS-Completeness Screening Checklist

Experts In-Processing Signature: S Hill

EPA Reg. Number: <u>42750-23</u>		EPA Receipt Date: <u>8/2/10</u>		
	Check List Item	Yes	No	NA
1	Application Form (EPA Form 8570-1) - signed?	<input checked="" type="checkbox"/>		
2	Confidential Statement of Formula (EPA Form 8570-29) - signed?	<input checked="" type="checkbox"/>		
3	Certification with Respect to Citation of Data (EPA Form 8570-34) signed?			<input checked="" type="checkbox"/>
4	Formulator's Exemption Statement (EPA Form 8570-27) - signed?			<input checked="" type="checkbox"/>
5	Data Matrix (EPA Form 8570-35) [Applicable, for adding me-too uses]			<input checked="" type="checkbox"/>
	a) Selective Method?			
	b) Cite-All Method? Applicant owns data or list only the companies offered to pay			
	c) Public copy of Matrix provided? See PR Notice 98-5			
6	Is Label Included? (5 copies)			<input checked="" type="checkbox"/>
Comments:				
<p>CSF</p> <p><i>[Signature]</i></p> <p>ACT 1</p> <p>J. GILCHRIST</p> <p><i>Inerts approved</i></p>				

**CORPORATE OFFICE**

1525 NE 36th Street  
Ankeny, IA 50021  
515.964.9444 - Office  
800.247.8013 - Toll Free  
515.964.7813 - Facsimile

**ALBAUGH, INC.**

**Valdosta Office**  
P.O. Box 2127  
304 Janet Street, Suite H  
Valdosta, GA 31604  
229.244.3288 - Office  
229.244.5841 - Facsimile

FED-X

July 30, 2010

Document Processing Desk (AMEND)  
Ms. Kathryn Montague (PM 23)  
Registration Division (7504P)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
One Potomac Yard (South Bldg)  
2777 South Crystal Dr.  
Arlington, VA 22202

RE: Alternate CSF amendments

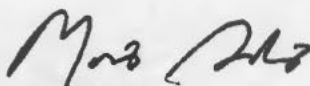
Dear Ms. Montague,

The enclosed submission for the following registrations are proposed alternate CSFs to add an optional surfactant system from [REDACTED] Copies of the MSDSs for each surfactant are enclosed.

PRODUCT	EPA REG. NO.	ALTERNATE CSF #s
2,4-D LV 4	42750-15	3, 4 & 5
2,4-D LV 6	42750-20	3, 4 & 5
MCPA Ester 4	42750-23	1
Clopyralid Acid + MCPA Ester	42750-91	2 & 3
Triclopyr BEE + 2,4-D BEE	42750-124	4, 5, 6 & 7

Please call if you have any questions.

Regards,



Morris Gaskins  
Registrations Manager

\*Product ingredient source information may be entitled to confidential treatment\*





United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 42750-23	2. EPA Product Manager K. Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) MCPA Ester 4	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Submission of proposed alternate CSF # 1 to add alternate surfactant system

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted			If "Yes" Unit Packaging wgt.	No. per container	
			If "Yes" Package wgt	No. per container	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2.5 gal, 30 gal, bulk		5. Location of Label Directions <input checked="" type="checkbox"/> On label attached to container	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Morris Gaskins	Title Registrations Manager	Telephone No. (Include Area Code) 229-244-3288	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)  
2. Signature 	3. Title Registrations Manager		
4. Typed Name Morris Gaskins	5. Date July 30, 2010		

**CORPORATE OFFICE**

1525 NE 36th Street  
Ankeny, IA 50021  
515.964.9444 - Office  
800.247.8013 - Toll Free  
515.964.7813 - Facsimile

**ALBAUGH, INC.****Valdosta Office**

P.O. Box 2127  
304 Janet Street, Suite H  
Valdosta, GA 31604  
229.244.3288 - Office  
229.244.5841 - Facsimile

FED-X

July 30, 2010

Document Processing Desk (AMEND)  
Ms. Kathryn Montague (PM 23)  
Registration Division (7504P)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
One Potomac Yard (South Bldg)  
2777 South Crystal Dr.  
Arlington, VA 22202

RE: Alternate CSF amendments

Dear Ms. Montague,

The enclosed submission for the following registrations are proposed alternate CSFs to add an optional surfactant system from [REDACTED] Copies of the MSDSs for each surfactant are enclosed.

PRODUCT	EPA REG. NO.	ALTERNATE CSF #s
2,4-D LV 4	42750-15	3, 4 & 5
2,4-D LV 6	42750-20	3, 4 & 5
MCPA Ester 4	42750-23	1
Clopyralid Acid + MCPA Ester	42750-91	2 & 3
Triclopyr BEE + 2,4-D BEE	42750-124	4, 5, 6 & 7

Please call if you have any questions.

Regards,



Morris Gaskins  
Registrations Manager

\*Product ingredient source information may be entitled to confidential



PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS





United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 42750-23	2. EPA Product Manager J. Miller	3. Proposed Classification <input type="checkbox"/> None <input checked="" type="checkbox"/> Restricted
4. Company/Product (Name) MCPA Ester 4	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604 <input type="checkbox"/> Check if this is a new address	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation: Use additional page(s) if necessary. (For section I and Section II.)**Notification of adding alternate source of previously approved solvent to basic ~~and alternate~~ CSF.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no further changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under section 12 and 14 of FIFRA.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
* Certification must be submitted				Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1 gal, 2.5 gal, 30 gal, bulk		5. Location of Label Directions <input checked="" type="checkbox"/> Attached to container	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Morris Gaskins		Title Registrations Manager		Telephone No. (Include Area Code) 229-244-3288	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Registrations Manager			
4. Typed Name Morris Gaskins		5. Date October 15, 2009			

**CORPORATE OFFICE**

1525 NE 36th Street  
Ankeny, IA 50021  
515.964.9444 - Office  
800.247.8013 - Toll Free  
515.964.7813 - Facsimile

**Valdosta Office**

P.O. Box 2127  
304 Janet Street, Suite H  
Valdosta, GA 31604  
229.244.3288 - Office  
229.244.5841 - Facsimile

FED-X

October 15, 2009

Document Processing Desk (NOTIFY)  
Ms. Joanne Miller (PM 23)  
Registration Division (7504P)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
One Potomac Yard (South Bldg)  
2777 South Crystal Dr.  
Arlington, VA 22202

RE: MCPA Ester 4  
EPA Reg. No. 42750-23

Dear Ms. Miller,

The enclosed submission for the above referenced product is a notification under PR Notice 98-10 for the basic ~~and alternate~~ CSF to add an additional supplier for a previously approved solvent. An MSDS for the alternate supplier's product is enclosed. In addition to adding the alternate supplier, we have also updated the flash point value in Box 9 to reflect that of the new solvent. This flash point value conforms with that in an OPPTS Guideline 830.6315 study recently submitted to the Agency for this registration.

Please call if you have any questions.

Regards,

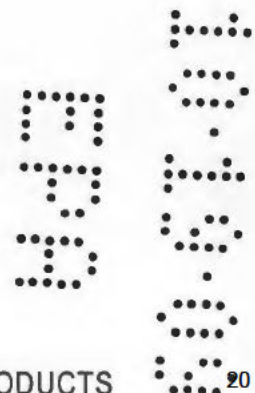
A handwritten signature in black ink, appearing to read "Morris Gaskins".

Morris Gaskins  
Registrations Manager  
Albaugh, Inc.



PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS

[www.albaughinc.com](http://www.albaughinc.com)



# Material to be added to a Mini-Jacket (in the case where an e-Jacket exists)

Reg. No. 42750-23

Send to SIG: check box ☒

This material is:

☐ New stamped-accepted label

☒ New CSF

☐ Notification

☐ Final Printed Label

☒ Other:

Product Re-registration

Instructions: Attach this notice on top of the material. It must be clipped all together and there should be NO STAPLES in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name:

Veronica Delah

Phone:

308-8585

Division:

SRID

Date:

7-6-2009



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Morris Gaskins  
Albaugh, Inc.  
1525 NE 36<sup>th</sup> Street  
Ankeny, IA 50021

JUL 14 2009

Dear Mr. Gaskins:

SUBJECT: Revised Basic Confidential Statement of Formula (CSF)  
MCPA Ester 4  
EPA Registration No. 42750-23  
Your Application dated April 7, 2009

The Agency has completed its review of the revised basic CSF, dated April 7, 2009, for the above named product. It was concluded that the CSF is acceptable with the following provisions:

1. Within thirty (30) days of the date of this letter, submit the flash point data from a valid test (Guideline 830.6315). The current flash point listed on the basic CSF, dated March 2, 2004 is 145 F.
2. The accepted label may need to be changed if the new product has the same flash point (145 F). as the basic CSF dated March 2, 2004. If so, the label warning must state: "Combustible. Do not store near heat of open flame."
3. If product testing indicates that the revised product is explosive, or its flash point/flame extension values change, appropriate label warning statements will be required.
4. Because inclusion of a new solvent may alter the flammability and explosivity properties of this product, the registrant must determine the value of these physical chemical properties (Guidelines 830.6315 and 830.6316) using the new formulation and submit them to the Agency for review.

A copy has been placed in your files as part of the record and a copy of the review is enclosed for your records. This CSF supersedes the previously accepted basic CSF.

Sincerely yours,

Joanne I. Miller  
Product Manager (23)  
Herbicide Branch  
Registration Division (7505P)

Enclosure





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OPPTS/OPP/RD/TRB/PRODUCT CHEMISTRY TEAM

WASHINGTON, D.C. 20460

DATE OUT: June 17, 2009

SUBJECT: Product Chemistry Review of the EP, 'MCPA Ester 4' Reg No 42750-23  
Barcode#: 365327 Decision #: 408956 PC Code(s): 030564 Food Use: YES

FROM: Linda L. Kutney, Chemist  
Product Chemistry Team  
Technical Review Branch/RD (7505C)

*Linda L. Kutney*  
*6-17-09*

*STW 6/17/09*

TO: Joanne Miller, Diane Morgan  
Herbicide Branch/ RD (7505C)

INTRODUCTION:

Albaugh, Inc., in a letter dated 4-7-09, has submitted a revised basic CSF (dated 4-7-09) for MCPA Ester 4, having a label claim of 69.7% MCPA, 2-EHE. The product is used on food crops. No data were submitted.

SUMMARY OF FINDINGS:

1. The nominal concentration on the CSF agrees with the label claim (PRN 91-2 is satisfied).
2. All of the inert components on the CSF are acceptable for the intended food uses.
3. The revised CSF contains slightly more of a new petroleum solvent [REDACTED] approved for food use to growing crops, replacing an older solvent.
4. The current flash point listed on the basic CSF, dated 3-2-04, is 145 F, and the current label warning states, "do not store near heat or open flame."
5. No Flashpoint/flame extension is listed on the revised CSF in box 9, this was listed as 145F on the basic CSF dated 3-2-04.

\*Manufacturing process information may be entitled to confidential treatment\*

TRB CONCLUSIONS:

1. The revised CSF contains slightly more of a new petroleum solvent [REDACTED] approved for food use to growing crops, replacing an older solvent.
2. The revised alternate CSF (dated 4-7-09) for MCPA Ester 4 is not acceptable without the required flash point/flame extension result in box 9.
3. Because inclusion of a new solvent may alter the flammability and explosivity properties of this product, the Registrant must determine the value of these physical chemical properties (Guidelines 830.6315 and 830.6316) using the new formulation and submit them to the Agency for review.
4. The flash point/ flame extension values must be included in box 9 of a revised CSF and must agree with the current label warnings.
5. The current flash point listed on the basic CSF, dated 3-2-04, is 145 F. If the new product has the same flash point, the label warning must state, "*Combustible*. Do not store near heat or open flame." The word "*Combustible*" must be added to the label, depending on the flash point/ flame extension results and it must be in italics.
6. If product testing indicates that the revised product is explosive, or its flash point/ flame extension values change, appropriate label warning statements will be required.

**CORPORATE OFFICE**

1525 NE 36th Street  
Ankeny, IA 50021  
515.964.9444 - Office  
800.247.8013 - Toll Free  
515.964.7813 - Facsimile

**ALBAUGH, INC.****Valdosta Office**

P.O. Box 2127  
304 Janet Street, Suite H  
Valdosta, GA 31604  
229.244.3288 - Office  
229.244.5841 - Facsimile

FED-X

April 7, 2009

Document Processing Desk (AMEND)  
Ms. Joanne Miller (PM 23)  
Registration Division (7504P)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
One Potomac Yard (South Bldg)  
2777 South Crystal Dr.  
Arlington, VA 22202

RE: MCPA Ester 4  
EPA Reg. No. 42750-23

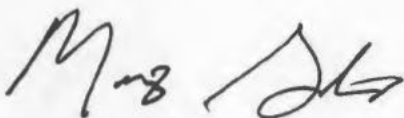
Dear Ms. Miller,

The enclosed submission is an amended basic CSF to replace the existing [REDACTED] solvent with one approved for application to terrestrial food crops. In addition, the supplier name for the active ingredient has been updated.

This proposed amendment replaces the CSF previously approved by the Agency for the MCPA RED.

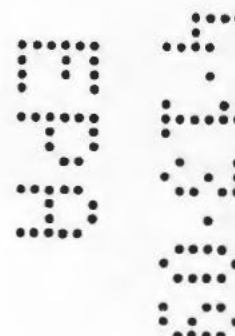
Please call if you have any questions.

Regards,



Morris Gaskins  
Registrations Manager  
Albaugh, Inc.

\*Inert ingredient information may be entitled to confidential treatment\*



**Agri Star®**  
By Albaugh, Inc.

PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS  
[www.albaughinc.com](http://www.albaughinc.com)





United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 42750-23	2. EPA Product Manager J. Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) MCPA Ester 4	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604 <input type="checkbox"/> Check if this is a new address	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Submission of amended CSF to replace solvent and update active ingredient supplier name.

**Section - III**

1. Material This Product Will Be Packaged in:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container	Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2.5 gal, 30 gal, bulk		5. Location of Label Directions <input checked="" type="checkbox"/> On label attached to container	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Morris Gaskins	Title Registrations Manager	Telephone No. (Include Area Code) 229-244-3288	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)  
2. Signature 	3. Title Registrations Manager		
4. Typed Name Morris Gaskins	5. Date April 7, 2009		

# MATERIAL TO BE ADDED TO JACKET

REG #

42750-23

Description:

check all that apply		
<input type="checkbox"/>	new stamped accepted label	Send to CSC
<input type="checkbox"/>	new CSF	
<input checked="" type="checkbox"/>	notification	

## Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's  
Name:

Nicole Williams

Date:

2.19.08

Phone:

703-308-5551

Division:

RD

Am. Mus. Nat. Hist.

Am. Mus. Nat. Hist.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

February 7, 2008

**NOTIFICATION**

Morris Gaskins  
Registration Manager  
Albaugh Inc.  
P.O. Box 2127  
Valdosta, GA 31604-2127

Subject: Label Notification(s) for Pesticide Registration Notice 2007-4

Dear Mr. Gaskins:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated January 23, 2008 for:

**EPA Registration 42750-23**

**MCPA Ester 4**

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-2007-4.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identify the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact me directly at 703-305-6249 or Nicole Williams of my staff at 703-308-5551.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington", is positioned above the typed name.

Linda Arrington  
Notifications & Minor Formulations Team Leader  
Registration Division (7505P)  
Office of Pesticide Programs



**CORPORATE OFFICE**

1525 NE 36th Street  
Ankeny, IA 50021  
515.964.9444 - Office  
800.247.8013 - Toll Free  
515.964.7813 - Facsimile

**ALBAUGH, INC.****Valdosta Office**

P.O. Box 2127  
304 Janet Street, Suite H  
Valdosta, GA 31604  
229.244.3288 - Office  
229.244.5841 - Facsimile

FED-X

January 23, 2008

Document Processing Disk (NOTIF)  
Office of pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

RE: Label notification for "Pesticide Management and Disposal; Standards for Pesticide Containers and Containment"

Dear Sirs,

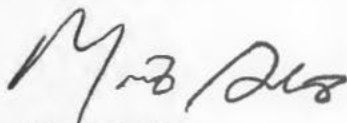
The enclosed submissions are draft labels submitted in response to Pesticide Regulation Notice 2007-4 for the following Albaugh registrations:

PRODUCT	EPA REG. NO.
MCPA Ester 4	42750-23

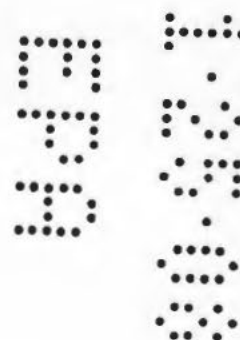
Changes are noted in strikeout for deleted text and underline/bold for added text.

Please call if you have any questions.

Regards,



Morris Gaskins  
Registrations Manager  
Albaugh, Inc.



**Agri Star**  
By Albaugh, Inc.

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[www.albaughinc.com](http://www.albaughinc.com)



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 42750-23	2. EPA Product Manager E. Kraft	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) MCPA Ester 4	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604-2127 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2.5, 30, 250 bulk		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled		<input type="checkbox"/> Other _____			

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Morris Gaskins		Title Registrations Manager		Telephone No. (Include Area Code) 229-244-3288	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					
2. Signature 		3. Title Registrations Manager		6. Date Application Received (Stamped) 	
4. Typed Name Morris Gaskins		5. Date January 23, 2008			

## ALBAUGH MCPA ESTER 4

HERBICIDE FOR SELECTIVE CONTROL OF CERTAIN WEEDS  
IN WHEAT, OATS, BARLEY, RYE, GRASSLAND AND IN NON-CROP AREAS

ACTIVE INGREDIENT:

2-ethylhexyl ester of 2-methyl-4-chlorophenoxyacetic acid\* ..... 69.7%

OTHER INGREDIENTS†: ..... 30.3%

TOTAL.....100.0%

\*Equivalent to 44.7% of 2-methyl-4-chlorophenoxyacetic acid isomer specific of not less than 3.7 pounds of 2-methyl-4-chlorophenoxyacetic acid isomer specific per gallon at 68°F. Isomer specific by AOAC Method.

†Contains petroleum distillates.

KEEP OUT OF REACH OF CHILDREN

### CAUTION

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none"><li>• Immediately call a poison control center or doctor.</li><li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li><li>• Do not give any liquid to the person.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
IF INHALED:	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
Contains petroleum distillate - vomiting may cause aspiration pneumonia.	

See inside booklet for additional Precautionary Statements.

EPA Reg. No. 42750-23

EPA Est. No. 42750-MO-001

NET CONTENTS: 2.5 gallon

MANUFACTURED BY:

Albaugh, Inc.

Ankeny, Iowa 50021

FOR CHEMICAL SPILL, LEAK, FIRE, OR EXPOSURE CALL CHEMTREC (800) 424-9300

PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for Category E on an EPA chemical-resistance category selection chart.

Mixers, loaders, applicators, flaggers and other handlers must wear:

- Long-sleeved shirt and long pants,
- Chemical-resistant gloves such as barrier laminate, nitrile rubber, neoprene rubber or viton.
- Shoes plus socks, and

Additional PPE requirements for mixers and loaders supporting aerial application to rangelands, pasture lands, or noncropland. These mixers/loaders also must wear:

- A chemical resistant apron, and
- A NIOSH-approved particulate filtering respirator equipped with any N, R, or P class filter media with NIOSH approval prefix TC-84A. It is recommended that the respirator wearer be fit tested, and trained in the use, maintenance, and limitations of the respirator.

See engineering controls for additional requirements.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROLS

Pilots must use an enclosed cockpit that meets the requirements listed in the WPS for agricultural pesticides [40 CFR 170.240(d)(6)]

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.



## ENVIRONMENTAL HAZARDS

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Runoff of this product will be reduced by avoiding applications when rainfall is forecasted to occur within 48 hours.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

## PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

### NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses. Do not enter treated areas without protective clothing until sprays have dried.

Do not enter or allow others to enter the treated area until sprays have dried.

## STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in a dry location away from children, animals, foods, feeds, seeds and other agricultural chemicals. Keep container closed when not using. Do not allow water into container as this may cause deterioration of product. Handle in accordance with information given under "Precautionary Statements." Keep storage area locked when not in use.

In the event of spillage or leakage, soak up material with absorbent clay, sand, sawdust or other absorbent material. Scrape up and dispose of in accordance with information given under "Pesticide Disposal." Repackage and relabel usable product in a sound container. In case of fire or other emergency, report at once by toll-free telephone to 800-424-9300.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

### CONTAINER DISPOSAL

**METAL CONTAINERS**—Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**PLASTIC CONTAINERS**—Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

**Non-refillable containers (1, 2.5, 30 & 55 gallon): Do not reuse or refill this container. Offer for recycling, if available. Triple rinse or pressure rinse container (or equivalent) promptly after emptying.**

**(non-refillable <5 gallons): Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.**

**(non-refillable >5 gallons): Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.**

**Pressure rinse as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use for disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.**

**Refillable container (250 gallon & bulk): Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.**

**To clean the container before final disposal, empty the remaining contents from the container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate**

**into application equipment or rinsate collection system. Repeat this rinsing process two more times.**

#### GENERAL INFORMATION

Local conditions may affect the use of this chemical. Consult State Agricultural Extension or Experiment Station Weed Specialists for specific recommendations for local weed problems and for information on possible lower dosages. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically directed and other influencing factors in the use of this product are beyond the control of the seller. To the extent consistent with applicable law buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith. Do not apply this product through any type of irrigation system.

#### CONTROLS THESE AND OTHER WEEDS

##### SUSCEPTIBLE (MOST AREAS):

Annual sowthistle  
Beggarticks  
Cocklebur  
Dragonhead mint  
Field peppergrass  
Goatsbeard  
Hempnettle

Lambsquarters  
(goosefoot)  
Marshelder  
Mustards (annual)  
Poison hemlock  
Puncturevine  
Ragweed

Shepherdspurse  
Stinkweed  
(pennycress,  
fanweed)  
Wild radish  
Yellow rocket  
or wintercress

##### LESS SUSCEPTIBLE:

Buttercups  
Canada thistle  
Chervil  
Dandelions  
Kochia  
Miner's lettuce

Perennial sow  
Plantains  
Purslane  
Russian pigweed  
Stinging nettle

Sunflower  
Vetch  
White top or  
hoary cress

#### PREPARATION OF THE SPRAY

Fill the spray tank with half the required amount of water, then add the recommended amount of MCPA Ester 4 and continue filling the spray tank with the balance of water. Keep agitator running when filling spray tank and during spray operations. For crop uses, do not mix with oil, surfactant or other adjuvants as this may reduce selectivity to crops resulting in crop damage or kill. When cleaning equipment, do not pour washwater on the ground; spray or drain over a large area away from wells and other water sources.

Do not apply MCPA Ester 4 by aerial application in the vicinity of sugar beets. Do not apply MCPA Ester 4 around houses, recreation sites, or similar areas.

#### AMOUNT OF SPRAY TO APPLY

Apply 5 to 15 gallons of total spray per acre when making applications with ground equipment and 2 to 5 gallons of total spray per acre when making applications by aircraft unless directed otherwise under specific directions. Carefully read the Environmental Hazards section of the Precautionary Statements for further information on spray volume.

## SPRAY DRIFT MANAGEMENT

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

Apply only as a medium or coarser spray (ASAE standard 572) or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.

Apply only when wind speed is 2-10 mph at the application site.

### FOR AERIAL APPLICATION:

- The distance of the outer most nozzles on the boom must not exceed 75% of the wingspan or 90% rotor blade diameter.
- Release spray at the lowest height consistent with efficacy and flight safety. Do not release spray at a height greater than 10 feet above the crop canopy.

### FOR GROUND BOOM APPLICATION:

- Do not apply with a nozzle height greater than 4 feet above the crop canopy.

**SWATH ADJUSTMENT:** When applications are made with a crosswind, the swath will be displaced downwind. The applicator must compensate for this displacement at the downwind edge of application area by adjusting the path of the aircraft upwind.

**TEMPERATURE INVERSIONS:** Do not make applications during a temperature inversion because drift potential is high.

**SENSITIVE AREAS:** The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitats for threatened or endangered species, non-target crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

Where states have more stringent regulations, they should be observed. The applicator should be familiar with and take into account the information covered in the Aerial Drift Reduction Advisory Information.

### WHEAT, OATS, BARLEY AND RYE:

Apply as a water mix spray by ground sprayer or airplane. Use 1/2 to 1 pint per acre for the more susceptible weeds after crop has reached the 3 to 4 leaf stage up to boot stage. Use up to 3  $\frac{1}{2}$  pints per acre for the less susceptible weeds after crop has tillered and up to early boot stage.

Do not spray from boot to dough stage.

Do not forage or graze meat animals on treated areas within 7 days of slaughter.

Do not forage or graze dairy animals on treated areas within 7 days after treatment.

Do not apply more than 1  $\frac{2}{3}$  pints (0.75 lb acid equivalent) per acre per year

### FLAX:

Use 1/4 to 1/2 pint per acre. Apply by ground sprayer or by airplane. Apply only when weeds are up and when flax is 4 to 8 inches high and before it comes into bud. Treatment after early bud stage may result in severe damage. If Canada thistle is present, it may be necessary to go as high as 1/2 pint per acre to prevent seed head production. Some injury to the flax may result.

Do not forage or graze meat animals on treated areas within 7 days of slaughter.  
Do not forage or graze dairy animals on treated areas within 7 days after treatment.  
Do not apply more than 1/2 pints (0.25 lb acid equivalent) per acre per year

## GRASSES

### ESTABLISHED PASTURE/RANGELAND:

Use 1 to 3 pints per acre. Apply by ground sprayer in not less than 5 gallons or by airplane in not less than two gallons total spray volume. Use higher rate for White Top, Canada thistle and other less susceptible weeds. Spray perennials in early bud to full bloom stage and regrowth in fall; other weeds in spring or fall, when actively growing.

- Do not forage or graze meat animals on treated areas within 7 days of slaughter.
- Do not forage or graze dairy animals on treated areas within 7 days after treatment.
- Do not apply more than 3 1/4 pints (1.5 lb acid equivalent) per acre per year
- Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.

### GRASSES GROWN FOR SEED: (aerial and surface applications):

Use 1 to 2 pints per acre, the higher rate where weed stands are heavy. In established grasses, apply in spring before head comes into boot and on seedling grass after grass has tillered.

Note: For weed control in grasses, repeated treatment may be needed for less susceptible weeds. In some areas bent, buffalo, carpet and St. Augustine grasses may also be injured by treatment.

- Do not apply more than 3 1/4 pints (1.5 lb acid equivalent) per acre per year
- Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.

NON-CROP SPRAYING (In non-crop areas such as Roadsides, Fence Rows, Rights-of-Way and similar places to control Canada Thistle, White Top And Meadow Buttercup)

For spot treatment, use 1/4 pint in 3 to 4 gallons of water. Spray to wet weeds thoroughly when in bud to early bloom and again on fall regrowth.

- Do not apply more than 6 1/2 pints (3.0 lb acid equivalent) per acre per year.

For broadcast treatment apply 2 to 3 pints per acre in sufficient water to give coverage for most extensive areas. Spray to wet weeds thoroughly when in bud to early bloom and again on fall regrowth.

- Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.
- Do not apply more than 3 1/4 pints (1.5 lb acid equivalent) per acre per year.
- Do not forage or graze livestock or dairy animals on treated areas within 7 days of treatment.

### GOLF COURSES:



For controlling whitetop, dandelions and similar weeds, apply 1 to 2 pints per acre in sufficient water to provide thorough coverage. Treatment may reduce stands of clover which may be present. Do not apply to newly seeded turf until grass has become well established. MCPA may injure bent or other creeping grass types. For best result treat thistles when in the early bud stage.

- Do not apply more than 3-1/2 pints (1.5 lb acid equivalent) per acre per year.
- Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.

#### SOD FARMS:

For broadcast application, apply 1 to 3 pints per acre in a spray volume of 10 to 100 gallons of water. Use the higher rate for heavy infestations or less susceptible weed species. For best results, apply in spring or fall when weeds are rapidly growing and do not mow for 2 days before or after application. For spot treatment in small areas, use 1 fluid ounce per 1000 square feet in 1 to 3 gallons of spray and apply uniformly.

NOTE: Repeat applications may be required for less susceptible weeds. In some areas, bent, buffalo, carpet and St. Augustine grasses may also be injured.

- Do not apply more than 3 1/4 pints (1.5 lb acid equivalent) per acre per year.
- Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.

#### CONDITIONS OF SALE AND WARRANTY

The DIRECTIONS FOR USE of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of ALBAUGH, INC., its Supplemental Distributors, or the Seller. To the extent consistent with applicable law, all such risks shall be assumed by the Buyer.

ALBAUGH, INC., its Supplemental Distributors and the Seller warrant that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use subject to the inherent risks referred to above. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, NEITHER ALBAUGH, INC. NOR ITS SUPPLEMENTAL DISTRIBUTORS MAKE ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS FOR ANY PARTICULAR PURPOSE OR OF MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S EXCLUSIVE REMEDY AND THE EXCLUSIVE LIABILITY OF ALBAUGH, INC., ITS SUPPLEMENTAL DISTRIBUTORS AND THE SELLER FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF OR THE REPAYMENT OF THE PURCHASE PRICE FOR THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. When Buyer suffers losses or damages resulting from the use or handling of this product (including claims based on contract, negligence, strict liability, or other legal theories), Buyer must promptly notify Seller in writing of any claims to be eligible to receive either remedy stated above.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO CASE SHALL ALBAUGH, INC., ITS SUPPLEMENTAL DISTRIBUTORS, OR THE SELLER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. ALBAUGH, INC., its Supplemental Distributors, and the Seller offer this product, and the Buyer accepts it, subject to the foregoing Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of ALBAUGH, INC. No employee or agent of ALBAUGH, INC., its Supplemental Distributor, or the Seller is authorized to vary or exceed the terms of this Warranty in any other manner.

8 B 3 3

# MATERIAL TO BE ADDED TO JACKET

REG #

4280 - 23

Description:

Reregistration Notice,  
Stamped label, data matrix

check all that apply	
<input checked="" type="checkbox"/>	new stamped accepted label
<input type="checkbox"/>	new CSF
<input type="checkbox"/>	notification

Send to CSC

## Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's  
Name:

Hope Johnson

Date:

1/17/08

Phone:

305-5410

Division:

RD





U.S. Environmental Protection Agency  
Office of Pesticide Programs  
Registration Division (7505C)  
1200 Pennsylvania Ave., N.W.  
Washington, D.C. 20460

EPA Reg.  
Number:

42750-23

Date of Issuance:

1-17-08

Term of Issuance: \_\_\_\_\_

Name of Pesticide Product:

Albaugh MCPA Ester 4

NOTICE OF PESTICIDE:

☐ Registration  
☒ Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Albaugh, Inc.  
PO Box 2127, 304 Janet Street, Suite H  
Valdosta, GA 31604

**Note:** Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is reregistered in accordance with FIFRA provided you agree in writing to:

1. Remove the statements "Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse" from the Precautionary Statements
2. On page 6, remove "3/4" from the section Flax.
3. On page 7, revise "3 pints" to "3 1/2 pints" in the section Golf Courses.

You will submit one (1) copy of your final printed labeling before you release the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). A stamped copy of labeling is enclosed for your records.

Signature of Approving Official:

Erik Kraft, Acting Product Manager (23)  
Herbicide Branch, Registration Division (7505P)

Date:

1-17-08

11/17/2008

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.

## ALBAUGH MCPA ESTER 4

HERBICIDE FOR SELECTIVE CONTROL OF CERTAIN WEEDS  
IN WHEAT, OATS, BARLEY, RYE, GRASSLAND AND IN NON-CROP AREAS

42750-23

### ACTIVE INGREDIENT:

2-ethylhexyl ester of 2-methyl-4-chlorophenoxyacetic acid\* ..... 69.7%

OTHER INGREDIENTS†: ..... 30.3%

TOTAL.....100.0%

\*Equivalent to 44.7% of 2-methyl-4-chlorophenoxyacetic acid isomer specific of not less than 3.7 pounds of 2-methyl-4-chlorophenoxyacetic acid isomer specific per gallon at 68°F. Isomer specific by AOAC Method.

†Contains petroleum distillates.

KEEP OUT OF REACH OF CHILDREN

### CAUTION

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none"><li>• Immediately call a poison control center or doctor.</li><li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li><li>• Do not give any liquid to the person.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
IF INHALED:	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
Contains petroleum distillate - vomiting may cause aspiration pneumonia.	

See inside booklet for additional Precautionary Statements.

EPA Reg. No. 42750-23

EPA Est. No. 42750-MO-001

NET CONTENTS: 2.5 gallon

MANUFACTURED BY:  
Albaugh, Inc.  
Ankeny, Iowa 50021

FOR CHEMICAL SPILL, LEAK, FIRE, OR EXPOSURE CALL CHEMTREC (800) 424-9300



PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for Category E on an EPA chemical-resistance category selection chart.

Mixers, loaders, applicators, flaggers and other handlers must wear:

- Long-sleeved shirt and long pants,
- Chemical-resistant gloves such as barrier laminate, nitrile rubber, neoprene rubber or viton.
- Shoes plus socks, and

Additional PPE requirements for mixers and loaders supporting aerial application to rangelands, pasture lands, or noncropland. These mixers/loaders also must wear:

- A chemical resistant apron, and
- A NIOSH-approved particulate filtering respirator equipped with any N, R, or P class filter media with NIOSH approval prefix TC-84A. It is recommended that the respirator wearer be fit tested, and trained in the use, maintenance, and limitations of the respirator.

See engineering controls for additional requirements.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROLS

Pilots must use an enclosed cockpit that meets the requirements listed in the WPS for agricultural pesticides [40 CFR 170.240(d)(6)]

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

## ENVIRONMENTAL HAZARDS

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Runoff of this product will be reduced by avoiding applications when rainfall is forecasted to occur within 48 hours.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

## PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

### NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses. Do not enter treated areas without protective clothing until sprays have dried.

Do not enter or allow others to enter the treated area until sprays have dried.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

##### PESTICIDE STORAGE

Store in a dry location away from children, animals, foods, feeds, seeds and other agricultural chemicals. Keep container closed when not using. Do not allow water into container as this may cause deterioration of product. Handle in accordance with information given under "Precautionary Statements." Keep storage area locked when not in use.

In the event of spillage or leakage, soak up material with absorbent clay, sand, sawdust or other absorbent material. Scrape up and dispose of in accordance with information given under "Pesticide Disposal." Repackage and relabel usable product in a sound container. In case of fire or other emergency, report at once by toll-free telephone to 800-424-9300.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

##### CONTAINER DISPOSAL

**METAL CONTAINERS** - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**PLASTIC CONTAINERS** - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

#### GENERAL INFORMATION

Local conditions may affect the use of this chemical. Consult State Agricultural Extension or Experiment Station Weed Specialists for specific recommendations for local weed problems and for information on possible lower dosages. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically directed and other influencing factors in the use of this product are beyond the control of the seller. To the extent consistent with applicable law buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith. Do not apply this product through any type of irrigation system.

#### CONTROLS THESE AND OTHER WEEDS

##### SUSCEPTIBLE (MOST AREAS):

Annual sowthistle	Lambsquarters	Shepherdspurse
Beggarticks	(goosefoot)	Stinkweed
Cocklebur	Marshelder	(pennycress,
Dragonhead mint	Mustards (annual)	fanweed)
Field peppergrass	Poison hemlock	Wild radish
Goatsbeard	Puncturevine	Yellow rocket
Hempnettle	Ragweed	or wintercress

##### LESS SUSCEPTIBLE:

Buttercups	Perennial sow	Sunflower
Canada thistle	Plantains	Vetch
Chervil	Purslane	White top or
Dandelions	Russian pigweed	hoary cress
Kochia	Stinging nettle	
Miner's lettuce		

## PREPARATION OF THE SPRAY

Fill the spray tank with half the required amount of water, then add the recommended amount of MCPA Ester 4 and continue filling the spray tank with the balance of water. Keep agitator running when filling spray tank and during spray operations. For crop uses, do not mix with oil, surfactant or other adjuvants as this may reduce selectivity to crops resulting in crop damage or kill. When cleaning equipment, do not pour washwater on the ground; spray or drain over a large area away from wells and other water sources.

Do not apply MCPA Ester 4 by aerial application in the vicinity of sugar beets. Do not apply MCPA Ester 4 around houses, recreation sites, or similar areas.

## AMOUNT OF SPRAY TO APPLY

Apply 5 to 15 gallons of total spray per acre when making applications with ground equipment and 2 to 5 gallons of total spray per acre when making applications by aircraft unless directed otherwise under specific directions. Carefully read the Environmental Hazards section of the Precautionary Statements for further information on spray volume.

## SPRAY DRIFT MANAGEMENT

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

Apply only as a medium or coarser spray (ASAE standard 572) or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.

Apply only when wind speed is 2-10 mph at the application site.

### FOR AERIAL APPLICATION:

- The distance of the outer most nozzles on the boom must not exceed 75% of the wingspan or 90% rotor blade diameter.
- Release spray at the lowest height consistent with efficacy and flight safety. Do not release spray at a height greater than 10 feet above the crop canopy.

### FOR GROUND BOOM APPLICATION:

- Do not apply with a nozzle height greater than 4 feet above the crop canopy.

**SWATH ADJUSTMENT:** When applications are made with a crosswind, the swath will be displaced downwind. The applicator must compensate for this displacement at the downwind edge of application area by adjusting the path of the aircraft upwind.

**TEMPERATURE INVERSIONS:** Do not make applications during a temperature inversion because drift potential is high.

**SENSITIVE AREAS:** The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitats for threatened or endangered species, non-target crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

Where states have more stringent regulations, they should be observed. The applicator should be

familiar with and take into account the information covered in the Aerial Drift Reduction Advisory Information.

#### WHEAT, OATS, BARLEY AND RYE:

Apply as a water mix spray by ground sprayer or airplane. Use 1/2 to 1 pint per acre for the more susceptible weeds after crop has reached the 3 to 4 leaf stage up to boot stage. Use up to 3 1/2 pints per acre for the less susceptible weeds after crop has tillered and up to early boot stage.

Do not spray from boot to dough stage.

Do not forage or graze meat animals on treated areas within 7 days of slaughter.

Do not forage or graze dairy animals on treated areas within 7 days after treatment.

Do not apply more than 1 2/3 pints (0.75 lb acid equivalent) per acre per year.

#### FLAX:

Use 1/4 to 1/2 pint per acre. Apply by ground sprayer or by airplane. Apply only when weeds are up and when flax is 4 to 8 inches high and before it comes into bud. Treatment after early bud stage may result in severe damage. If Canada thistle is present, it may be necessary to go as high as 3/4 1/2 pint per acre to prevent seed head production. Some injury to the flax may result.

Do not forage or graze meat animals on treated areas within 7 days of slaughter.

Do not forage or graze dairy animals on treated areas within 7 days after treatment.

Do not apply more than 1/2 pint (0.25 lb acid equivalent) per acre per year.

#### GRASSES

##### ESTABLISHED PASTURE/RANGELAND:

Use 1 to 3 pints per acre. Apply by ground sprayer in not less than 5 gallons or by airplane in not less than two gallons total spray volume. Use higher rates for White Top, Canada thistle and other less susceptible weeds. Spray perennials in early bud to full bloom stage and regrowth in fall; other weeds in spring or fall, when actively growing.

- Do not forage or graze meat animals on treated areas within 7 days of slaughter.
- Do not forage or graze dairy animals on treated areas within 7 days after treatment.
- Do not apply more than 3 1/4 pints (1.5 lb acid equivalent) per acre per year.
- Do not apply more than 2 applications per year with a minimum retreatment interval of 20 days.

##### GRASSES GROWN FOR SEED: (aerial and surface applications):

Use 1 to 2 pints per acre, the higher rate where weed stands are heavy. On established grasses, apply in spring before head comes into bud and on seedling grass after grass has tillered.

Note: For weed control in grasses, repeated treatment may be needed for less susceptible weeds. On some sweet bent, buffalo, carpet and St. Augustine grasses may also be injured by treatment.

- Do not apply more than 3 1/4 pints (1.5 lb acid equivalent) per acre per year.
- Do not apply more than 2 applications per year with a minimum retreatment interval of 20 days.



NON-CROP SPRAYING (In non-crop areas such as Roadsides, Fence Rows, Rights-of-Way and similar places to control Canada Thistle, White Top And Meadow Buttercup)

For spot treatment, use 1/4 pint in 3 to 4 gallons of water. Spray to wet weeds thoroughly when in bud to early bloom and again on fall regrowth.

- Do not apply more than 6 1/2 pints (3.0 lb acid equivalent) per acre per year.

For broadcast treatment apply 2 to 3 pints per acre in sufficient water to give coverage for most extensive areas. Spray to wet weeds thoroughly when in bud to early bloom and again on fall regrowth.

- Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.
- Do not apply more than 3 1/4 pints (1.5 lb acid equivalent) per acre per year.
- Do not forage or graze livestock or dairy animals on treated areas within 7 days of treatment.

#### GOLF COURSES:

For controlling whitetop, dandelions and similar weeds, apply 1 to 2 pints per acre in sufficient water to provide thorough coverage. Treatment may reduce stands of clover which may be present. Do not apply to newly seeded turf until grass has become well established. MCPA may injure bent or other creeping grass types. For best result treat thistles when in the early bud stage.

- Do not apply more than 3 pints (1.5 lb acid equivalent) per acre per year.
- Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.

#### SOD FARMS:

For broadcast application, apply 1 to 3 pints per acre in a spray volume of 10 to 100 gallons of water. Use the higher rate for heavy infestations or less susceptible weed species. For best results, apply in spring or fall when weeds are rapidly growing and do not mow for 2 days before or after application. For spot treatment in small areas, use 1 fluid ounce per 1000 square feet in 1 to 3 gallons of spray and apply uniformly.

NOTE: Repeat applications may be required for less susceptible weeds. In some areas, bent, buffalo, carpet and St. Augustine grasses may also be injured.

- Do not apply more than 3 1/4 pints (1.5 lb acid equivalent) per acre per year.
- Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.

#### CONDITIONS OF SALE AND WARRANTY

The DIRECTIONS FOR USE of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of ALBAUGH, INC., its Supplemental Distributors, or the Seller. To the extent consistent with applicable law, all such risks shall be assumed by the Buyer.

ALBAUGH, INC., its Supplemental Distributors and the Seller warrant that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use subject to the inherent risks referred to above. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, NEITHER ALBAUGH, INC. NOR ITS SUPPLEMENTAL DISTRIBUTORS MAKE ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS FOR ANY PARTICULAR PURPOSE OR OF MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S EXCLUSIVE REMEDY AND THE EXCLUSIVE LIABILITY OF ALBAUGH, INC., ITS SUPPLEMENTAL DISTRIBUTORS AND THE SELLER FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF OR THE REPAYMENT OF THE PURCHASE PRICE FOR THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. When Buyer suffers losses or damages resulting from the use or handling of this product (including claims based on contract, negligence, strict liability, or other legal theories), Buyer must promptly notify Seller in writing of any claims to be eligible to receive either remedy stated above.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO CASE SHALL ALBAUGH, INC., ITS SUPPLEMENTAL DISTRIBUTORS, OR THE SELLER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. ALBAUGH, INC., its Supplemental Distributors, and the Seller offer this product, and the Buyer accepts it, subject to the foregoing Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of ALBAUGH, INC. No employee or agent of ALBAUGH, INC., its Supplemental Distributor, or the Seller is authorized to vary or exceed the terms of this Warranty in any other manner.

**CORPORATE OFFICE**

1525 NE 36th Street  
Ankeny, IA 50021  
515.964.9444 - Office  
800.247.8013 - Toll Free  
515.964.7813 - Facsimile

**ALBAUGH, INC.****Valdosta Office**

P.O. Box 2127  
304 Janet Street, Suite H  
Valdosta, GA 31604  
229.244.3288 - Office  
229.244.5841 - Facsimile

FED-X

January 10, 2007

Mr. Erik Kraft (PM 23)  
Registration Division  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
2777 South Crystal Dr.  
Arlington, VA 22202

RE: MCPA Ester 4  
EPA Reg. No. 42750-23

Dear Mr. Kraft,

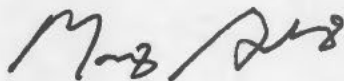
The enclosed submission for the above referenced registration is in response to the Agency's letter of January 3, 2008.

The following documents are enclosed to support this application:

- Application Form (8570-1)
- Draft label (3 copies)
- Certification With Respect to Citation of Data (8570-34)
- Data Matrix (internal) (8570-35)
- Data Matrix (public) (8570-35)

Please call if you have any questions.

Regards,



Morris Gaskins  
Registrations Manager  
Albaugh, Inc.  
229-244-3288

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**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604	EPA Registration Number/File Symbol 42750-23
Active Ingredient(s) and/or representative test compound(s) MCPA, ethyl hexyl ester	Date 1/8/08
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) terrestrial food use, non-crop	Product Name MCPA Ester 4

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT** (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
--	---

**SECTION II: GENERAL OFFER TO PAY**

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Date

Jan. 10, 2008

Typed or Printed Name and Title

Morris Gaskins Registrations Manager

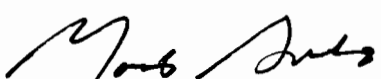
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**DATA MATRIX**

<b>Date:</b> 1/10/08	<b>EPA Reg. No./File Symbol</b> 42750-23	Page 1 of 6
<b>Applicant's/Registrant's Name &amp; Address:</b> Albaugh Inc. 121 NE 18 <sup>th</sup> St. Ankeny, IA 50021	<b>Product:</b> <b>MCPA Ester 4</b>	

**Ingredient:** MCPA 2-ethylhexyl ester CAS # 26544-20-7


Guideline Reference	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	46930602	Albaugh	OWN	
830.1600	Description of Materials Used to Produce the	46930602	Albaugh	OWN	
830.1620	Description of Production Process				Waiver <sup>2</sup>
830.1650	Description of Formulation Process	46930602	Albaugh	OWN	
830.1670	Description of Formation of Impurities	46930602	Albaugh	OWN	
830.1700	Preliminary Analysis				Not req'd <sup>1</sup>
830.1750	Certified Limits	46930602	Albaugh	OWN	
830.1800	Enforcement Analytical Method	46930602	Albaugh	OWN	
830.6302	Color	46930603	Albaugh	OWN	
830.6303	Physical State	46930603	Albaugh	OWN	
830.6304	Odor	46930603	Albaugh	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions				Not req'd <sup>1</sup>
830.6314	Oxidation/Reduction: Chemical Incompatibility	46930603	Albaugh	OWN	
830.6315	Flammability	46930603	Albaugh	OWN	
830.6316	Explosibility				Waiver <sup>3</sup>
830.6317	Storage Stability	47240101			
<b>Signature</b> 			<b>Name and Title:</b> Morris Gaskins Registrations Manager		<b>Date:</b> 1/10/08



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<b>Date: 1/10/08</b>		<b>EPA Reg. No./File Symbol</b> 42750-23		Page 2 of 6	
<b>Applicant's/Registrant's Name &amp; Address:</b> Albaugh Inc. 121 NE 18 <sup>th</sup> St. Ankeny, IA 50021		<b>Product:</b> <b>MCPA Ester 4</b>			
<b>Ingredient:</b> MCPA 2-ethylhexyl ester CAS # 26544-20-7					
<b>Guideline Reference Number</b>	<b>Guideline Study Name</b>	<b>MRID Number</b>	<b>Submitter</b>	<b>Status</b>	<b>Note</b>
830.6319	Miscibility				Waiver <sup>4</sup>
830.6320	Corrosion Characteristics	47240101			
830.6321	Dielectric Breakdown Voltage				Waiver <sup>5</sup>
830.7000	pH	46930603	Albaugh	OWN	
830.7050	UV/Visible Absorption				Not req'd <sup>1</sup>
830.7100	Viscosity	46930603	Albaugh	OWN	
830.7200	Melting Point/Melting Range				Not req'd <sup>1</sup>
830.7220	Boiling Point/Boiling Range				Not req'd <sup>1</sup>
830.7300	Density/Relative Density/Bulk Density	46930603	Albaugh	OWN	
830.7370	Dissociation Constants in Water				Not req'd <sup>1</sup>
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method				Not req'd <sup>1</sup>
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				Not req'd <sup>1</sup>
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				Not req'd <sup>1</sup>
<b>Signature</b> 			<b>Name and Title:</b> Morris Gaskins Registrations Manager		<b>Date:</b> <b>1/10/08</b>


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<b>Date: 1/10/08</b>			<b>EPA Reg. No./File Symbol</b> 42750-23		Page 3 of 6
<b>Applicant's/Registrant's Name &amp; Address:</b> Albaugh Inc. 121 NE 18 <sup>th</sup> St. Ankeny, IA 50021			<b>Product:</b> <b>MCPA Ester 4</b>		
<b>Ingredient:</b> MCPA 2-ethylhexyl ester CAS # 26544-20-7					
<b>Guideline Reference Number</b>	<b>Guideline Study Name</b>	<b>MRID Number</b>	<b>Submitter</b>	<b>Status</b>	<b>Note</b>
830.7840	Water Solubility: Column Elution Method; Shake Flask Method				Not req'd <sup>1</sup>
830.7860	Water Solubility, Generator Column Method				Not req'd <sup>1</sup>
830.7950	Vapor Pressure				Not req'd <sup>1</sup>
870.1100	Acute Oral Toxicity - Rat	41992301	Albaugh	OWN	
870.1200	Acute Dermal Toxicity - Rat	41992302	Albaugh	OWN	
870.1300	Acute Inhalation Toxicity - Rat	41992303	Albaugh	OWN	
870.2400	Primary Eye Irritation - Rabbit	41992304	Albaugh	OWN	
870.2500	Primary Dermal Irritation	41992305	Albaugh	OWN	
870.2600	Dermal Sensitization	41992306	Albaugh	OWN	
<b>Signature</b> 			<b>Name and Title:</b> Morris Gaskins Registrations Manager		<b>Date:</b> 1/10/08


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**DATA MATRIX**

<b>Date:</b> 1/10/08		<b>EPA Reg. No./File Symbol</b> 42750-23		Page 4 of 6	
<b>Applicant's/Registrant's Name &amp; Address:</b> Albaugh Inc. 121 NE 18 <sup>th</sup> St. Ankeny, IA 50021		<b>Product:</b> <b>MCPA Ester 4</b>			
<b>Ingredient:</b> MCPA 2-ethylhexyl ester CAS # 26544-20-7					
<b>Guideline Reference Number</b>	<b>Guideline Study Name</b>	<b>MRID</b>	<b>Submitter (EPA Co. No.)</b>	<b>Status</b>	<b>Note</b>
<b>MCPA generic data requirements</b>					
Albaugh will make offers-to-pay to the following companies that appear on the data submitters list as of January 1, 2008					
MCPA Generic Data	Cite-All		Nufarm Americas (228)	PAY	
MCPA Generic Data	Cite-All		Bayer Cropscience (264)	PAY	
MCPA Generic Data	Cite-All		Winfield solutions (1381)	PAY	
MCPA Generic Data	Cite-All		PBI Gordon (2217)	PAY	
MCPA Generic Data	Cite-All		BASF (7969)	PAY	
MCPA Generic Data	Cite-All		AH Marks (15440)	PAY	
MCPA Generic Data	Cite-All		Dow AgroScience (62719)	PAY	
MCPA Generic Data	Cite-All		MANA (66222)	PAY	
MCPA Generic Data	Cite-All		Spray Drift Task Force (66607)	PAY	
MCPA Generic Data	Cite-All		Nufarm (71368)	PAY	
MCPA Generic Data	Cite-All		Outdoor Resident Exposure TF (71754)	PAY	
MCPA Generic Data	Cite-All		Ag Reentry Task Force (71755)	PAY	
MCPA Generic Data	Cite-All		Institute of Ind Organic Chem (71917)	PAY	
<b>Signature:</b> 			<b>Name and Title:</b> Morris Gaskins Registrations Manager		<b>Date:</b> 1/10/08

## DATA MATRIX

Page 5 of 6

**Product:** MCPA Ester 4

[illegible]

**Date:**  
**1/10/08**

## Footnotes for MCPA Ester 4 Data Matrix

### Footnote 1

- 830.6313 Stability to Normal and Elevated Temperature, Metals, and Metal Ions
- 830.1700 Preliminary analysis
- 830.7050 UV/Visible absorption
- 830.7200 Melting point
- 830.7370 Dissociation Constants in Water
- 830.7550 Partition coefficient
- 830.7560 Partition coefficient
- 830.7570 Partition coefficient
- 830.7840 Water solubility
- 830.7860 Water solubility
- 830.7950 Vapor Pressure

830.1650 Production Process. Albaugh requests a waiver for this data requirement. MCPA Ester 4 product is formulated. See Guideline 830.1650.

### Footnote 2

- 830.1620 Production Process. Albaugh requests a waiver for this data requirement. MCPA Ester 4 product is formulated. See Guideline 830.1650.

### Footnote 3

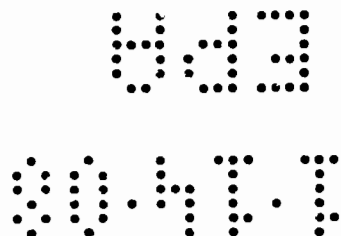
- 830.6316 Explodibility. Albaugh requests a waiver for this data requirement. MCPA Ester 4 product is not composed of explosive components and therefore does not exhibit explosive characteristics.

### Footnote 4

- 830.6319 Miscibility. Albaugh requests a waiver for this data requirement. MCPA Ester 4 is not intended to be diluted with oil or other non-polar solvents.

### Footnote 5

- 830.6321 Dielectric breakdown voltage. Albaugh requests a waiver for this data requirement. MCPA Ester 4 is not labeled or intended for use around electrical equipment.





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**DATA MATRIX**

**Date:** 1/10/08 **EPA Reg. No./File Symbol** 42750-23 **Page** 1 of 6

**Applicant's/Registrant's Name & Address:** Albaugh Inc.  
 121 NE 18<sup>th</sup> St.  
 Ankeny, IA 50021

**Product:**  
**MCPA Ester 4**


**Ingredient:** MCPA 2-ethylhexyl ester CAS # 26544-20-7

Guideline Reference	Guideline Study Name	MRID Number	Submitter	Status	Note
			Albaugh	OWN	
			Albaugh	OWN	
					Waiver <sup>2</sup>
			Albaugh	OWN	
			Albaugh	OWN	
					Not req'd <sup>1</sup>
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
					Not req'd <sup>1</sup>
			Albaugh	OWN	
			Albaugh	OWN	
					Waiver <sup>3</sup>
Signature			Name and Title: Morris Gaskins Registrations Manager		Date: 1/10/08

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<b>Applicant's/Registrant's Name &amp; Address:</b> Albaugh Inc. 121 NE 18 <sup>th</sup> St. Ankeny, IA 50021		<b>Product:</b> <b>MCPA Ester 4</b>			
<b>Ingredient:</b> MCPA 2-ethylhexyl ester CAS # 26544-20-7					
<b>Guideline Reference Number</b>	<b>Guideline Study Name</b>	<b>MRID Number</b>	<b>Submitter</b>	<b>Status</b>	<b>Note</b>
					Waiver <sup>4</sup>
					Waiver <sup>5</sup>
			Albaugh	OWN	
					Not req'd <sup>1</sup>
			Albaugh	OWN	
					Not req'd <sup>1</sup>
					Not req'd <sup>1</sup>
			Albaugh	OWN	
					Not req'd <sup>1</sup>
					Not req'd <sup>1</sup>
					Not req'd <sup>1</sup>
					Not req'd <sup>1</sup>
<b>Signature</b> 			<b>Name and Title:</b> Morris Gaskins Registrations Manager		<b>Date:</b> 1/10/08

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<b>Applicant's/Registrant's Name &amp; Address:</b> Albaugh Inc. 121 NE 18 <sup>th</sup> St. Ankeny, IA 50021		<b>Product:</b> <b>MCPA Ester 4</b>			
<b>Ingredient:</b> MCPA 2-ethylhexyl ester CAS # 26544-20-7					
<b>Guideline Reference Number</b>	<b>Guideline Study Name</b>	<b>MRID Number</b>	<b>Submitter</b>	<b>Status</b>	<b>Note</b>
					Not req'd <sup>1</sup>
					Not req'd <sup>1</sup>
					Not req'd <sup>1</sup>
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
<b>Signature</b> 			<b>Name and Title:</b> Morris Gaskins Registrations Manager		<b>Date:</b> 1/10/08

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M Street, S.W.**  
**WASHINGTON, DC 20460**

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137) U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

**DATA MATRIX**


<b>Date:</b> 1/10/08		<b>EPA Reg. No./File Symbol</b> 42750-23		Page 4 of 6	
<b>Applicant's/Registrant's Name &amp; Address:</b> Albaugh Inc. 121 NE 18 <sup>th</sup> St. Ankeny, IA 50021		<b>Product:</b> <b>MCPA Ester 4</b>			
<b>Ingredient:</b> MCPA 2-ethylhexyl ester CAS # 26544-20-7					
<b>Guideline Reference Number</b>	<b>Guideline Study Name</b>	<b>MRID</b>	<b>Submitter (EPA Co. No.)</b>	<b>Status</b>	<b>Note</b>
<b>MCPA generic data requirements</b>					
Albaugh will make offers-to-pay to the following companies that appear on the data submitters list as of January 1, 2008					
			Nufarm Americas (228)	PAY	
			Bayer Cropscience (264)	PAY	
			Winfield solutions (1381)	PAY	
			PBI Gordon (2217)	PAY	
			BASF (7969)	PAY	
			AH Marks (15440)	PAY	
			Dow AgroScience (62719)	PAY	
			MANA (66222)	PAY	
			Spray Drift Task Force (66607)	PAY	
			Nufarm (71368)	PAY	
			Outdoor Resident Exposure TF (71754)	PAY	
			Ag Reentry Task Force (71755)	PAY	
			Institute of Ind Organic Chem (71917)	PAY	
<b>Signature</b> 		<b>Name and Title:</b> Morris Gaskins Registrations Manager		<b>Date:</b> 1/10/08	



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**DATA MATRIX**

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			Ag Handlers Exposure TF (75234)	PAY	
			FIFRA Endangered Species TF (73989)	PAY	
			REJV (74888)	PAY	
			Ag-Value-Clopyr (75147)	PAY	
			Ag Handlers Exposure TF (75234)	PAY	
<b>Signature</b>			<b>Name and Title:</b> Morris Gaskins Registrations Manager		<b>Date:</b> 1/10/08



## Footnotes for MCPA Ester 4 Data Matrix

### Footnote 1

- 830.6313 Stability to Normal and Elevated Temperature, Metals, and Metal Ions
- 830.1700 Preliminary analysis
- 830.7050 UV/Visible absorption
- 830.7200 Melting Point
- 830.7220 Boiling Point
- 830.7370 Dissociation Constants in Water
- 830.7550 Partition coefficient
- 830.7560 Partition coefficient
- 830.7570 Partition coefficient
- 830.7840 Water solubility
- 830.7860 Water solubility
- 830.7950 Vapor Pressure

This data is not required for end use products per Product Properties Test Guidelines OPPTS 830.1000 (e)(2)(xi)(B) Table 2

### Footnote 2

- 830.1620 Production Process . Albaugh requests a waiver for this data requirement. MCPA Ester 4 product is formulated. See Guideline 830.1650.

### Footnote 3

- 830.6316 Explodibility. Albaugh requests a waiver for this data requirement. MCPA Ester 4 product is not composed of explosive components and therefore does not exhibit explosive characteristics.

### Footnote 4

- 830.6319 Miscibility. Albaugh requests a waiver for this data requirement. MCPA Ester 4 is not intended to be diluted with oil or other non-polar solvents.

### Footnote 5

- 830.6321 Dielectric breakdown voltage. Albaugh requests a waiver for this data requirement. MCPA Ester 4 is not labeled or intended for use around electrical equipment.



United States  
Environmental Protection Agency  
Washington, DC 20460

☒ Registration  
☐ Amendment  
☐ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 42750-23	2. EPA Product Manager E. Kraft	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) MCPA Ester 4	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604-2127 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated <u>1/3/08</u>	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Re-submission of revised draft label and data matrix for MCPA RED in response to Agency letter of January 3, 2008.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
					<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
					Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2.5 gal		5. Location of Label Directions <input checked="" type="checkbox"/> On label attached to container	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Morris Gaskins		Title Registrations Manager		Telephone No. (Include Area Code) 229-244-3288	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received 8/2/08 (Stamped)
2. Signature 		3. Title Registrations Manager			
4. Typed Name Morris Gaskins		5. Date January 10, 2008			

# MATERIAL TO BE ADDED TO JACKET

REG #

42750-23

Description:

Unacceptable R&D amendment  
and PRB document

check all that apply		Send to CSC
<input type="checkbox"/>	new stamped accepted label	
<input type="checkbox"/>	new CSF	
<input type="checkbox"/>	notification	

## Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's  
Name:

Hepe Johnson

Date:

1/3/08

Phone:

305-5410

Division:

RD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

13-08

Mr. Morris Gaskins  
Albaugh, Inc.  
PO Box 2127  
304 Janet Street, Suite H  
Valdosta, GA 31604

Subject: Albaugh MCPA Ester 4  
EPA Registration Number 42750-23  
Label submitted per MCPA DCI (EPA Pin-punch date 9-11-06)  
MCPA Reregistration Required Label Revisions

Dear Mr. Gaskins:

The amendment referred to above, submitted in connection with reregistration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is unacceptable. Reregistration of this product will be considered only after the following changes are made, resubmitted, and approved:

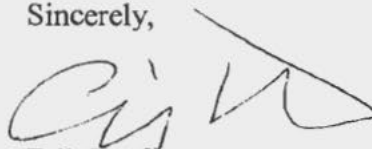
- 1) Add appropriate Net Contents information to the label.
- 2) Add "(PPE)" after the heading "PERSONAL PROTECTIVE EQUIPMENT"
- 3) Remove "when mixing, loading, or using any hand-held equipment" from the PPE glove requirement and replace with "such as barrier laminate, nitrile rubber, neoprene rubber or viton"
- 4) Remove "protective eyewear" from the PPE requirements
- 5) Revise the respirator PPE requirement to "A NIOSH approved particulate filtering respirator equipped with any N, R, or P class filter media with NIOSH approval number prefix TC-84A. It is recommended that the respirator wearer be fit tested, and trained in the use, maintenance, and limitations of the respirator."
- 6) Add "exist" after "washables" in the statement "If no such instructions for washables, use detergent and hot water."
- 7) Remove the statement "This pesticide may be toxic to fish, aquatic invertebrates and aquatic plants" from the ENVIRONMENTAL HAZARDS section.
- 8) Add the following statement to the NON-AGRICULTURAL USE REQUIREMENTS section "Do not enter or allow others to enter the treated area until sprays have dried."
- 9) Revise "recommended" to "directed" on page 4.
- 10) Add "To the extent consistent with applicable law before the statement "Buyer assumes all risks of use, storage....." on page 4.
- 11) Revise the word "downward" to "downwind" on page 5.

- 12) On page 7, in the section NON-CROP SPRAYING- Broadcast treatment, add the following restrictions:
- a. Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.
- 13) Add "To the extent consistent with applicable law" before the following statements on pages 7 and 8:
- a. "All such risks shall be assumed by the Buyer"
  - b. "Neither Albaugh Inc., nor it's supplemental distributors make any....."
  - c. "Buyers's exclusive remedy and the exclusive liability or Albaugh Inc."
  - d. "In no case shall Albaugh, Inc, it's supplemental distributors, or the seller be liable....."

Additionally, you must submit a revised data matrix and appropriate data compensation information for the uses you have added to the label (golf courses, sod farm).

You must submit three (3) copies of revised labeling incorporating the above changes within 30 days from the date of this letter. If you have any questions, please contact Hope Johnson at 703-305-5410.

Sincerely,



Erik Kraft  
Acting Product Manager 23  
Herbicide Branch  
Registration Division (7505P)



Resubmission - Reviewed

## ALBAUGH MCPA ESTER 4

HERBICIDE FOR SELECTIVE CONTROL OF CERTAIN WEEDS  
IN WHEAT, OATS, BARLEY, RYE, GRASSLAND AND IN NON-CROP AREAS

**ACTIVE INGREDIENT:**

2-ethylhexyl ester of 2-methyl-4-chlorophenoxyacetic acid\* ..... 69.7%

OTHER INGREDIENTS†: ..... 30.3%

TOTAL.....100.0%

\*Equivalent to 44.7% of 2-methyl-4-chlorophenoxyacetic acid isomer specific of not less than 3.7 pounds of 2-methyl-4-chlorophenoxyacetic acid isomer specific per gallon at 68°F. Isomer specific by AOAC Method.

†Contains petroleum distillates.

KEEP OUT OF REACH OF CHILDREN

### CAUTION

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none"><li>• Immediately call a poison control center or doctor.</li><li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li><li>• Do not give any liquid to the person.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
IF INHALED:	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
Contains petroleum distillate - vomiting may cause aspiration pneumonia.	

See inside booklet for additional Precautionary Statements.

EPA Reg. No. 42750-23

EPA Est. No. 42750-MO-001

NET CONTENTS: 2.5 gallon

**MANUFACTURED BY:**

Albaugh, Inc.  
Ankeny, Iowa 50021

FOR CHEMICAL SPILL, LEAK, FIRE, OR EXPOSURE CALL CHEMTREC (800) 424-9300

PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist. ~~Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.~~

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for Category E on an EPA chemical-resistance category selection chart.

Mixers, loaders, applicators, flaggers and other handlers must wear:

- Long-sleeved shirt and long pants,
- Chemical-resistant gloves such as barrier laminate, nitrile rubber, neoprene rubber or viton.
- Shoes plus socks, and

Additional PPE requirements for mixers and loaders supporting aerial application to rangelands, pasture lands, or noncropland. These mixers/loaders also must wear:

- A chemical resistant apron, and
- A NIOSH-approved particulate filtering respirator equipped with any N, R, or P class filter media with NIOSH approval prefix TC-84A. It is recommended that the respirator wearer be fit tested, and trained in the use, maintenance, and limitations of the respirator.

See engineering controls for additional requirements.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROLS

Pilots must use an enclosed cockpit that meets the requirements listed in the WPS for agricultural pesticides [40 CFR 170.240(d)(6)]

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

## ENVIRONMENTAL HAZARDS

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Runoff of this product will be reduced by avoiding applications when rainfall is forecasted to occur within 48 hours.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

## PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

### NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses. Do not enter treated areas without protective clothing until sprays have dried.

Do not enter or allow others to enter the treated area until sprays have dried.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

##### PESTICIDE STORAGE

Store in a dry location away from children, animals, foods, feeds, seeds and other agricultural chemicals. Keep container closed when not using. Do not allow water into container as this may cause deterioration of product. Handle in accordance with information given under "Precautionary Statements." Keep storage area locked when not in use.

In the event of spillage or leakage, soak up material with absorbent clay, sand, sawdust or other absorbent material. Scrape up and dispose of in accordance with information given under "Pesticide Disposal." Repackage and relabel usable product in a sound container. In case of fire or other emergency, report at once by toll-free telephone to 800-424-9300.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

##### CONTAINER DISPOSAL

**METAL CONTAINERS** - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**PLASTIC CONTAINERS** - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

#### GENERAL INFORMATION

Local conditions may affect the use of this chemical. Consult State Agricultural Extension or Experiment Station Weed Specialists for specific recommendations for local weed problems and for information on possible lower dosages. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically directed and other influencing factors in the use of this product are beyond the control of the seller. To the extent consistent with applicable law buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith. Do not apply this product through any type of irrigation system.

#### CONTROLS THESE AND OTHER WEEDS

##### SUSCEPTIBLE (MOST AREAS):

Annual sowthistle  
Beggarticks  
Cocklebur  
Dragonhead mint  
Field peppergrass  
Goatsbeard  
Hempnettle

Lambsquarters  
(goosefoot)  
Marshelder  
Mustards (annual)  
Poison hemlock  
Puncturevine  
Ragweed

Shepherdspurse  
Stinkweed  
(pennycress,  
fanweed)  
Wild radish  
Yellow rocket  
or wintercress

##### LESS SUSCEPTIBLE:

Buttercups  
Canada thistle  
Chervil  
Dandelions  
Kochia  
Miner's lettuce

Perennial sow  
Plantains  
Purslane  
Russian pigweed  
Stinging nettle

Sunflower  
Vetch  
White top or  
hoary cress



## PREPARATION OF THE SPRAY

Fill the spray tank with half the required amount of water, then add the recommended amount of MCPA Ester 4 and continue filling the spray tank with the balance of water. Keep agitator running when filling spray tank and during spray operations. For crop uses, do not mix with oil, surfactant or other adjuvants as this may reduce selectivity to crops resulting in crop damage or kill. When cleaning equipment, do not pour washwater on the ground; spray or drain over a large area away from wells and other water sources.

Do not apply MCPA Ester 4 by aerial application in the vicinity of sugar beets. Do not apply MCPA Ester 4 around houses, recreation sites, or similar areas.

## AMOUNT OF SPRAY TO APPLY

Apply 5 to 15 gallons of total spray per acre when making applications with ground equipment and 2 to 5 gallons of total spray per acre when making applications by aircraft unless directed otherwise under specific directions. Carefully read the Environmental Hazards section of the Precautionary Statements for further information on spray volume.

## SPRAY DRIFT MANAGEMENT

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

Apply only as a medium or coarser spray (ASAE standard 572) or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.

Apply only when wind speed is 2-10 mph at the application site.

### FOR AERIAL APPLICATION:

- The distance of the outer most nozzles on the boom must not exceed 75% of the wingspan or 90% rotor blade diameter.
- Release spray at the lowest height consistent with efficacy and flight safety. Do not release spray at a height greater than 10 feet above the crop canopy.

### FOR GROUND BOOM APPLICATION:

- Do not apply with a nozzle height greater than 4 feet above the crop canopy.

**SWATH ADJUSTMENT:** When applications are made with a crosswind, the swath will be displaced downwind. The applicator must compensate for this displacement at the downwind edge of application area by adjusting the path of the aircraft upwind.

**TEMPERATURE INVERSIONS:** Do not make applications during a temperature inversion because drift potential is high.

**SENSITIVE AREAS:** The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitats for threatened or endangered species, non-target crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

Where states have more stringent regulations, they should be observed. The applicator should be



familiar with and take into account the information covered in the Aerial Drift Reduction Advisory Information.

#### WHEAT, OATS, BARLEY AND RYE:

Apply as a water mix spray by ground sprayer or airplane. Use 1/2 to 1 pint per acre for the more susceptible weeds after crop has reached the 3 to 4 leaf stage up to boot stage. Use up to 3 1 2/3 pints per acre for the less susceptible weeds after crop has tillered and up to early boot stage.

Do not spray from boot to dough stage.

Do not forage or graze meat animals on treated areas within 7 days of slaughter.

Do not forage or graze dairy animals on treated areas within 7 days after treatment.

Do not apply more than 1 2/3 pints (0.75 lb acid equivalent) per acre per year

#### FLAX:

Use 1/4 to 1/2 pint per acre. Apply by ground sprayer or by airplane. Apply only when weeds are up and when flax is 4 to 8 inches high and before it comes into bud. Treatment after early bud stage may result in severe damage. If Canada thistle is present, it may be necessary to go as high as ~~3/4~~ 1/2 pint per acre to prevent seed head production. Some injury to the flax may result.

Do not forage or graze meat animals on treated areas within 7 days of slaughter.

Do not forage or graze dairy animals on treated areas within 7 days after treatment.

Do not apply more than 1/2 pints (0.25 lb acid equivalent) per acre per year

### GRASSES

#### ESTABLISHED PASTURE/RANGELAND:

Use 1 to 3 pints per acre. Apply by ground sprayer in not less than 5 gallons or by airplane in not less than two gallons total spray volume. Use higher rate for White Top, Canada thistle and other less susceptible weeds. Spray perennials in early bud to full bloom stage and regrowth in fall; other weeds in spring or fall, when actively growing.

- Do not forage or graze meat animals on treated areas within 7 days of slaughter.
- Do not forage or graze dairy animals on treated areas within 7 days after treatment.
- Do not apply more than 3 1/4 pints (1.5 lb acid equivalent) per acre per year
- Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.

#### GRASSES GROWN FOR SEED: (aerial and surface applications):

Use 1 to 2 pints per acre, the higher rate where weed stands are heavy. In established grasses, apply in spring before head comes into boot and on seedling grass after grass has tillered.

Note: For weed control in grasses, repeated treatment may be needed for less susceptible weeds. In some areas bent, buffalo, carpet and St. Augustine grasses may also be injured by treatment.

- Do not apply more than 3 1/4 pints (1.5 lb acid equivalent) per acre per year
- Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.

NON-CROP SPRAYING (In non-crop areas such as Roadsides, Fence Rows, Rights-of-Way and similar places to control Canada Thistle, White Top And Meadow Buttercup)

For spot treatment, use 1/4 pint in 3 to 4 gallons of water. Spray to wet weeds thoroughly when in bud to early bloom and again on fall regrowth.

- Do not apply more than 6 1/2 pints (3.0 lb acid equivalent) per acre per year.

For broadcast treatment apply 2 to 3 pints per acre in sufficient water to give coverage for most extensive areas. Spray to wet weeds thoroughly when in bud to early bloom and again on fall regrowth.

- Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.
- Do not apply more than 3 1/4 pints (1.5 lb acid equivalent) per acre per year.
- Do not forage or graze livestock or dairy animals on treated areas within 7 days of treatment.

#### GOLF COURSES:

For controlling whitetop, dandelions and similar weeds, apply 1 to 2 pints per acre in sufficient water to provide thorough coverage. Treatment may reduce stands of clover which may be present. Do not apply to newly seeded turf until grass has become well established. MCPA may injure bent or other creeping grass types. For best result treat thistles when in the early bud stage.

- Do not apply more than 3 1/4 pints (1.5 lb acid equivalent) per acre per year.
- Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.

#### SOD FARMS:

For broadcast application, apply 1 to 3 pints per acre in a spray volume of 10 to 100 gallons of water. Use the higher rate for heavy infestations or less susceptible weed species. For best results, apply in spring or fall when weeds are rapidly growing and do not mow for 2 days before or after application. For spot treatment in small areas, use 1 fluid ounce per 1000 square feet in 1 to 3 gallons of spray and apply uniformly.

NOTE: Repeat applications may be required for less susceptible weeds. In some areas, bent, buffalo, carpet and St. Augustine grasses may also be injured.

- Do not apply more than 3 1/4 pints (1.5 lb acid equivalent) per acre per year.
- Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.

#### CONDITIONS OF SALE AND WARRANTY

The DIRECTIONS FOR USE of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of ALBAUGH, INC., its Supplemental Distributors, or the Seller. To the extent consistent with applicable law, all such risks shall be assumed by the Buyer.

ALBAUGH, INC., its Supplemental Distributors and the Seller warrant that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use subject to the inherent risks referred to above. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, NEITHER ALBAUGH, INC. NOR ITS SUPPLEMENTAL DISTRIBUTORS MAKE ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS FOR ANY PARTICULAR PURPOSE OR OF MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S EXCLUSIVE REMEDY AND THE EXCLUSIVE LIABILITY OF ALBAUGH, INC., ITS SUPPLEMENTAL DISTRIBUTORS AND THE SELLER FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF OR THE REPAYMENT OF THE PURCHASE PRICE FOR THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. When Buyer suffers losses or damages resulting from the use or handling of this product (including claims based on contract, negligence, strict liability, or other legal theories), Buyer must promptly notify Seller in writing of any claims to be eligible to receive either remedy stated above.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO CASE SHALL ALBAUGH, INC., ITS SUPPLEMENTAL DISTRIBUTORS, OR THE SELLER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. ALBAUGH, INC., its Supplemental Distributors, and the Seller offer this product, and the Buyer accepts it, subject to the foregoing Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of ALBAUGH, INC. No employee or agent of ALBAUGH, INC., its Supplemental Distributor, or the Seller is authorized to vary or exceed the terms of this Warranty in any other manner.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

September 20, 2007

**MEMORANDUM:**

Subject: MCPA RED  
MCPA Ester 4  
EPA Reg. No.: 42750-23  
Re: PRB Preliminary Label Assessment

From: Mark Perry  
Product Reregistration Branch *WTP*  
Special Review and Reregistration Division (7508P)

Through: Lawrence Schnaubelt *Laman Schnaubelt 12/4/07*  
Product Reregistration Branch  
Special Review and Reregistration Division (7508P)

To: Joanne Miller, Product Manager 23  
Herbicide Branch  
Registration Division (7505P)

**SCOPE:** The primary purpose of this preliminary label assessment is to determine whether or not the draft labels submitted in connection with product reregistration comply with amended labeling language specified in Chapter V of the subject RED. Product-specific data (product chemistry, acute toxicity, and in some cases efficacy data) were also required to be submitted or cited to support product reregistration. PRB's reviews of these data are appended to this assessment and may require additional revisions to the product label.

**BACKGROUND:** The registrant has submitted 5 copies of draft labeling for the subject product in its 8-month response to the RED (dated 9/11/06). PRB has completed a preliminary assessment of the draft labeling. A copy of this assessment may be accessed electronically on the LAN through the Q-Drive. The path is q:\prb\label\042750\023.

**Note:** In addition to the information presented in this preliminary label assessment, Product Manager/Label Reviewers must apply their own knowledge of the subject product and the product's regulatory history (including comparison with existing stamped accepted labeling) to conduct a final review of the proposed label. It is the responsibility of the PM to obtain the necessary label improvements required for final product reregistration. PRB recommends that the PMs continue to follow the guidance provided in the Label Review Manual, including formatting suggestions presented in the sample labels in Chapter 3, to improve the quality and consistency of product labels.

#### **RECOMMENDATIONS:**

The subject product requires revisions to conform with the RED and/or technical review(s). Deficiencies are listed in the table below. Subject to final review by the Product Manager, PRB recommends that the registrant resubmit to the Product Manager revised product labeling that addresses the deficiencies specified in this review and any other deficiencies specified by the Product Manager.



## Appendix I

### PRB Label Analysis For Compliance With Label Revisions Specified In the RED and/or Technical Reviews

Label Requirement	Acceptable	Not Acceptable	Comments
Restricted Use Pesticide	N/A		
Ingredients Statement	X		
Signal Word	X		
First Aid	X		
Emergency Information	X		
Note to Physician	X		
Hazards to Humans and Domestic Animals	X		
PPE		X	<p>Per the acute toxicity review, delete the statement "when mixing, loading, or using any handheld equipment." and replace with "such as barrier laminate, nitrile rubber, neoprene rubber or viton."</p> <p>Per the MCPA RED, delete the statement "...prefix TC-21C or any N<sup>2</sup>, R, P or HE filter." and replace with "...prefix TC-21C or any R, P or HE filter."</p> <p>Per the MCPA RED and acute toxicity review, PRB recommends adding "(PPE)" immediately following the Personal Protective Equipment heading.</p>
Engineering Controls	X		
User Safety Requirements		X	Per page 85 of the MCPA RED, revise the statement "If no such instructions for washables, use detergent and hot water." to read "If no such instructions for washables exist, use detergent and hot water."
User Safety Recommendations	X		
Environmental Hazards	X		Per communications with Neil Anderson (SRRD), the following statement should be deleted: "This pesticide may be toxic to fish, aquatic invertebrates, and aquatic plants."
Physical and Chemical Hazards	X		
WPS text	X		
Non-WPS text			PRB recommends the following non-WPS entry restriction statement: "Do not enter or allow others to enter the treated area until sprays have dried."
Storage and Disposal	X		
Spray Drift Labeling	X		
General Precautions and	X		

Label Requirement	Acceptable	Not Acceptable	Comments
Restrictions			
Application Instructions		X	Per page 90 of the RED, for noncropland rights-of-way add the statement: “Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.”
Other Comments	N/A		

# MEMORANDUM

030564  
VD

DATE: 9 / 14 / 06

TO: PRB, Regulatory Manager

FROM: Information Services Branch, IRSD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted in OPPIN.

**We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.**

If you have any questions about this process, please contact Maureen Sherrill (305-5361) or Teresa Downs (305-5363).

This is a: ☒ fully accepted submission  
☐ partially accepted submission  
☐ rejected submission



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

August 16, 2007

MEMORANDUM:

Subject: EPA Reg. No.: 42750-23/MCPA Ester 4  
DP Barcode: 340568  
Case No.: 0017

From: Marianne Lewis, Biologist  
Product Reregistration Branch  
Special Review and Reregistration Division (7508C)

To: Veronica Dutch, CRM  
Product Reregistration Branch  
Special Review and Reregistration Division (7508C)

Applicant: Albaugh, Inc.  
1525 NE 36<sup>th</sup> Street  
Ankeny, IA 50021

*Marianne Lewis 8/16/07*

FORMULATION FROM EPA Reg. No. 42750-23 LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
MCPA .....	69.7%
<u>Inert Ingredient(s):</u> .....	30.3%
Total	100.0%

Contains Petroleum Distillates

BACKGROUND: In the 8 month response to the MCPA RED, the registrant is citing acute toxicity studies to support the reregistration of their product, EPA Reg. No. 42750-23. The MRID's are as follows: 419923-01 (81-1), 419923-02 (81-2), 419923-03 (81-3), 419923-04 (81-4), 419923-05 (81-5), 419923-06 (81-6). Five (81-1, 81-2, 81-4, 81-5, 81-6) of the studies were conducted by Toxikon Corporation. The acute inhalation study (81-3) was conducted by Product Safety Labs. The test material used in each of the studies was the subject product. These studies were reviewed and found to be acceptable by PRS/RD on 7/6/92. After reviewing the studies PRB concurs' with RD's findings.

RECOMMENDATIONS:

- The acute toxicity studies cited are acceptable to support the reregistration of EPA Reg. No. 42750-23.

The acute toxicity profile for EPA Reg. No. 42750-23 is currently:

Acute Oral	III	Cited
Acute Dermal	III	Cited
Acute Inhalation	III	Cited
Primary Eye	IV	Cited
Primary Dermal	IV	Cited
Skin Sensitization	non sensitizer	Cited

NOTE: The acute toxicity requirements have been satisfied for the subject product.



**LABELING:**

**ID #:** 042750-00023          MCPA ESTER 4

**INGREDIENT STATEMENT:**

Contains petroleum distillates.

**SIGNAL WORD:**                  **CAUTION**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS:**

Harmful if swallowed. Harmful if absorbed through skin. Harmful if inhaled. Avoid contact with eyes, skin, or clothing. Avoid breathing vapor or spray mist. Wear long sleeved shirt, long pants, shoes, socks, and chemical resistant gloves (barrier laminate, nitrile rubber, neoprene rubber, or viton, selection category E).

**FIRST AID:**

IF SWALLOWED: Immediately call a poison control center or doctor. Do not induce vomiting unless told to by a poison control center or doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

**USER SAFETY RECOMMENDATIONS:**

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of

gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

The proposed label must contain the following guidance:

**NOTE TO PHYSICIAN:**

May pose an aspiration pneumonia hazard.

Contains petroleum distillate.

. 2070-0080. Approval Expires 5-31-98.

**Applicant's Name and Address**

Albaugh Inc.  
P.O. Box 2127  
Valdosta, GA 31604-2127

EPA File Symbol/Registration Number

42750-23

Product Name

MCPA Ester 4

Date of Confidential Statement of Formula (EPA Form 8570-4)

9/8/06

**(1) This product contains the following active ingredient(s):**

MCPA ethylhexyl ester

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

(3) Indicate by checking (A) or (B) below which paragraph applies:

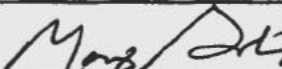
☒ (A) An accurate Confidential Statement of Formula (*EPA FORM 8570-4*) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

**OR**

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

### Source

Active Ingredient	Product Name	Registration Number
2-Ethylhexyl ester of 2-methyl-4-chlorophenoxy acetic acid	2-Ethylhexyl Ester of MCPA Technical	15440-9
Signature 	Name and Title Morris Gaskins Registrations Manager	Date 9/8/06



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 42750-23	2. EPA Product Manager J. Miller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) MCPA Ester 4	PM# 23	
5. Name and Address of Applicant (Include ZIP Code) Albaugh Inc. P.O. Box 2127 Valdosta, GA 31604-2127 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of 8-Month response for the MCPA RED

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted					
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2.5 gl, 30 gl, bulk		5. Location of Label Directions <input checked="" type="checkbox"/> On label attached to container	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Morris Gaskins		Title Registrations Manager	
		Telephone No. (Include Area Code) 229-214-3288	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)  
2. Signature 		3. Title Registrations Manager	
4. Typed Name Morris Gaskins		5. Date September 8, 2006	





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

August 16, 2007

MEMORANDUM:

Subject: EPA Reg. No.: 42750-23/MCPA Ester 4  
DP Barcode: 340568  
Case No.: 0017

From: Marianne Lewis, Biologist  
Product Reregistration Branch  
Special Review and Reregistration Division (7508C)

To: Veronica Dutch, CRM  
Product Reregistration Branch  
Special Review and Reregistration Division (7508C)

Applicant: Albaugh, Inc.  
1525 NE 36<sup>th</sup> Street  
Ankeny, IA 50021

*Marianne Lewis 8/16/07*

FORMULATION FROM EPA Reg. No. 42750-23 LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
MCPA .....	69.7%
<u>Inert Ingredient(s):</u> .....	30.3%
Total	100.0%

Contains Petroleum Distillates



BACKGROUND: In the 8 month response to the MCPA RED, the registrant is citing acute toxicity studies to support the reregistration of their product, EPA Reg. No. 42750-23. The MRID's are as follows: 419923-01 (81-1), 419923-02 (81-2), 419923-03 (81-3), 419923-04 (81-4), 419923-05 (81-5), 419923-06 (81-6). Five (81-1, 81-2, 81-4, 81-5, 81-6) of the studies were conducted by Toxikon Corporation. The acute inhalation study (81-3) was conducted by Product Safety Labs. The test material used in each of the studies was the subject product. These studies were reviewed and found to be acceptable by PRS/RD on 7/6/92. After reviewing the studies PRB concurs' with RD's findings.

RECOMMENDATIONS:

- The acute toxicity studies cited are acceptable to support the reregistration of EPA Reg. No. 42750-23.

The acute toxicity profile for EPA Reg. No. 42750-23 is currently:

Acute Oral	III	Cited
Acute Dermal	III	Cited
Acute Inhalation	III	Cited
Primary Eye	IV	Cited
Primary Dermal	IV	Cited
Skin Sensitization	non sensitizer	Cited

NOTE: The acute toxicity requirements have been satisfied for the subject product.

**LABELING:**

**ID #:** 042750-00023      MCPA ESTER 4

**INGREDIENT STATEMENT:**

Contains petroleum distillates.

**SIGNAL WORD:**              **CAUTION**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS:**

Harmful if swallowed. Harmful if absorbed through skin. Harmful if inhaled. Avoid contact with eyes, skin, or clothing. Avoid breathing vapor or spray mist. Wear long sleeved shirt, long pants, shoes, socks, and chemical resistant gloves (barrier laminate, nitrile rubber, neoprene rubber, or viton, selection category E).

**FIRST AID:**

**IF SWALLOWED:** Immediately call a poison control center or doctor. Do not induce vomiting unless told to by a poison control center or doctor. Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

**IF INHALED:** Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

**USER SAFETY RECOMMENDATIONS:**

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of

gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

The proposed label must contain the following guidance:

**NOTE TO PHYSICIAN:**

May pose an aspiration pneumonia hazard.

Contains petroleum distillate.

## Albaugh, Inc.

1525 NE 36<sup>th</sup> Street  
Ankeny, Iowa 50021  
515.964.9444 Office  
515.964.7813 Fax

304 H Janet Street  
Valdosta, Georgia 31602  
229.244.3288 Office  
229.244.5841 Fax

### Interoffice Memo

To:

*Ben Greg*

Cc:

From:

*Morris Gaskins*

RE:

*MCPA Esdr 4 CSF*

Date:

*8/10/07*

---

*Greg, Attached is revised CSF we discussed*

DATE OUT: August 10, 2007

SUBJECT: **REVISED PRODUCT CHEMISTRY REVIEW OF: Technical Product [ ],  
Manufacturing Use Product [ ],  
End Use Product [ X ]**

BARCODE No.: D340565

EPA RECEIVED DATE: 08-10-07

EPA Reg. No.: 42750-23

PRODUCT NAME: MCPA ESTER 4

MRIDs: [none new, but revised Alternate CSF]

COMPANY NAME: Albaugh, Inc.

Action Code: 674

FROM: Bentley C. Gregg, Product Chemist  
Product Chemistry Team  
PRB/SRRD (7508P)

*Bentley C. Gregg*  
*8/10/07*

TO: Veronica Dutch, CRM  
Product Reregistration Branch  
Special Review and Reregistration Division (7508P)

#### **INTRODUCTION:**

In response to an earlier Product Chemistry review (August 1, 2007; Bentley C. Gregg), the registrant, Albaugh, Inc., has submitted a revised Alternate Confidential Statement of Formula (CSF, dated 8/10/07), and is requesting FIFRA Section 4 reregistration of their end-use product, MCPA Ester 4, EPA Reg. No. 42750-23.

#### **FINDINGS:**

1. The registrant had previously satisfied all the data requirements for the physical and chemical properties of MCPA Ester 4, except for **Storage Stability (Guideline 830-6317)** and **Corrosion Characteristics (Guideline 830-6320)**. The registrant request for waiver from the requirement for submitting these data is herein accepted, and all physical and chemical properties data are now acceptable for MCPA Ester 4.
2. The registrant had submitted an acceptable Basic CSF (dated 9/8/06). The registrant has now submitted a revised Alternate CSF (dated 8/10/07), with amounts now listed for the active ingredient and all listed inert ingredients. The revised Alternate CSF indicates that this Alternate will be formulated with [REDACTED] having a reported concentration of [REDACTED] to achieve a nominal concentration of their end-use product of 69.70% (of 2-ethylhexyl ester of 2-methyl-4-chloro-phenoxyacetic acid). This is the amount listed on the Basic CSF, as well as that reported in OPPIN Query and on the submitted label [which also lists an acid equivalent (AE) concentration of 44.7%]. The Upper and Lower Certified Limits reported on this Alternate CSF are found to be acceptable, for the active ingredient and each of the inert ingredients. The inert ingredients are each cleared for food-use, and have exemptions from the requirement for a tolerance.

#### **CONCLUSIONS:**

With the waiving of Storage Stability and Corrosion Characteristics data (Finding 1) and the submission of an Alternate CSF (Finding 2), the registrant has satisfied the product chemistry requirements for reregistration of their end-use product, **MCPA ESTER 4, Reg. No. 42750-23**.

Reviewer and Central File (Reg. No. 42750-23).

7508P:SRRD:PRB:PY1:B.C.G.:08/10/07:703-308-8178:<42750-23>



DATE OUT: August 1, 2007

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: Technical Product [ ],  
Manufacturing Use Product [ ],  
End Use Product [ X ]

BARCODE No.: D340565

EPA RECEIVED DATE: 09-11-06

EPA Reg. No.: 42750-23

PRODUCT NAME: MCPA ESTER 4

MRIDs: 469306-01, 469306-02, 469306-03

COMPANY NAME: Albaugh, Inc.

Action Code: 674

FROM: Bentley C. Gregg, Product Chemist  
Product Chemistry Team  
PRB/SRRD (7508P)

*Bentley C. Gregg Aug. 1, 2007*

TO: Veronica Dutch, CRM  
Product Reregistration Branch  
Special Review and Reregistration Division (7508P)

#### **INTRODUCTION:**

The registrant, Albaugh, Inc., has submitted two revised Confidential Statement of Formula (CSFs, a Basic and an Alternate Formulation, both dated 9/8/06), a revised label (Agency pin-punched received date: 9-11-06), and three new MRIDs (469306-01, -02, and -03) containing product chemistry data, and is requesting FIFRA Section 4 reregistration of their end use product, MCPA Ester 4, EPA Reg. No. 42750-23.

A Reregistration Eligibility Decision (RED), Case # 0017, was issued in September 2004 for the Technical Grade Active Ingredient (TGAI) MCPA (2-methyl-4-chlorophenoxyacetic acid), and the RED included this active ingredient with the 2-ethylhexyl ester, which, thus, has the following chemical name: 2-ethylhexyl ester of 2-methyl-4-chlorophenoxyacetic acid (OPP Chemical Code 030564). The RED indicated that the existing available generic data concerning the physical/chemical properties of the active ingredient were acceptable, but that additional data were required for the specific products, including a revised CSF, a revised product label, and additional data regarding the product chemistry (such as production methods, analytical procedures, and physical and chemical properties data). The registrant has now submitted these data for their TGAI product.

#### **FINDINGS:**

1. The registrant submitted MRID 469306-01 and -03 for the physical and chemical properties of MCPA Ester 4. Certain data requirements are listed as requesting a waiver, each of which are being granted herein; thus, the data are deemed to be acceptable for the physical and chemical properties, except for **Storage Stability (Guideline 830-6317) and Corrosion Characteristics (Guideline 830-6320)**. The registrant is requested to submit these data as soon as possible.
2. The registrant has submitted MRID 469306-01 and -02 to provide information to satisfy the data requirements for this end-use product regarding the following Guidelines: 830-1550, Product Identity and Composition; 830-1600, Description of Materials Used to Produce the Product; 830-1650, Description of Formulation Process; and 830-1670, Discussion of Formation of Impurities. This information is deemed acceptable.

3. MRID 469306-02 lists the Enforcement of Analytical Method, specifically a procedure involving high performance liquid chromatography (HPLC) with an ultraviolet detector, for the quantification of the 2-ethylhexyl ester of MCPA.
4. The registrant has submitted a Basic and an Alternate CSF (both dated 9/8/06). [Note that the Alternate is only incompletely filled out, with no amounts listed for either the active ingredient or the last listed inert ingredient; therefore, only the Basic CSF will be reviewed in detail, until such time as the registrant makes the necessary additions to the Alternate CSF.] The Basic CSF indicates that the end-use product formulation utilizes Technical 2-Ethylhexyl Ester of MPCA (EPA Reg. No. 15440-9). This TGAI is incorporated to achieve a nominal concentration of 69.70% for the 2-ethylhexyl ester of 2-methyl-4-chloro-phenoxyacetic acid. This is the amount listed on the submitted label and reported in OPPIN Query, with the label also listing an acid equivalent (AE) concentration of 44.7%. The Upper and Lower Certified Limits reported on the Basic CSF are found to be acceptable, for both the active ingredient and the inert ingredients. The inert ingredients are each cleared for food-use, and have exemptions from the requirement for a tolerance.
5. The Physical or Chemical Hazard statement and the Storage and Disposal statement on the submitted label (Agency pin-punched received date: 9-11-06) appear to satisfy the requirements in the recent Label Review Manual. (It is expected that this issue will be more thoroughly clarified during the PRB Label Assessment Team review.)

#### **CONCLUSIONS:**

Once the registrant has provided the required Storage Stability and Corrosion Characteristics data (Finding 1), and if necessary, has submitted a more completely filled out Alternate CSF (Finding 4), the registrant will have satisfied the product chemistry requirements for reregistration of their end-use product, **MCPA ESTER 4, Reg. No. 42750-23.**

**REVIEW OF PRODUCT CHEMISTRY DATA:**

**PRODUCT NAME:** MCPA Ester 4; EPA Reg. No.: 42750-23

**Group A: Series 830-Product Identity, Composition, and Analysis (40 CFR 158.155, .160, .165, .167, .170, .175 & .180).**

830-1550 Product Identity and Composition

The registrant has submitted a Basic and an Alternate CSF (both 9/8/06) [however, the Alternate is not fully filled out, and thus, only the Basic is being reviewed]. The Basic CSF states that the end-use product, MCPA Ester 4, has a nominal concentration of the 2-ethylhexyl ester of MCPA of 69.70%, with 69.7% also listed on the revised label submitted, and with an acid equivalent (AE) of 44.7% also listed on the label. The 69.7% nominal concentration is also listed in OPPIN Query. The Lower and Upper Certified Limits listed on the Basic CSF for the active ingredient are also deemed acceptable, based on calculations utilizing the Agency regulations at 40 CFR 158.175 (b)(2).

830-1600 Description of Materials Used to Produce the Product

Refer to Confidential Appendix A.

830-1650 Discussion of Formulation Process

Refer to Confidential Appendix A.

830-1670 Discussion of Formation of Impurities

Refer to Confidential Appendix A.

830-1700 Preliminary Analysis

Refer to Confidential Appendix A.

830-1800 Enforcement of Analytical Method

The registrant has submitted MRID 469306-02, which includes a very brief listing of the details of the Enforcement of Analytical Method. This analytical method involves high performance liquid chromatography with an ultraviolet detector (280 nm), with the quantification of the active ingredient achieved relative to a reference standard of the MCPA ethyl-hexyl ester having a known purity, with the samples and standards dissolved in an acetonitrile/water mixture (35/65; that is, 35% acetonitrile and 65% water, which has been acidified with 2% acetic acid). The document contains a description of HPLC operating conditions, the injection volume and procedures, and the calculation equations.



**Group B: Series 830- Physical and Chemical Properties (40 CFR 158.190)**  
**MCPA Ester 4 (EPA Reg. No. 42750-23)**  
**Both MRID 469306-01 and -03 (both dated 2006), unless otherwise indicated**

<b>GUIDELINE REFERENCE NUMBER (GRN) / TITLE 830-</b>	<b>VALUE OR QUALITATIVE DESCRIPTION/ METHOD(S) USED WHERE APPLICABLE AND REFERENCES</b>
-6302 Color	"Amber"
-6303 Physical State	"Clear liquid"
-6304 Odor	"Fuel oil odor"
-6314 Oxidation/Reduction: Chemical Incompatibility	"Compatible with water, [10%] monoammonium phosphate, iron powder, kerosene, and [10%] potassium permanganate." Minimal changes in temperature were observed in testing with each of these five reactants.
-6315 Flammability/Flame Extension	"68.6 ± 0.5°C" [Block 9 on CSFs: "68 C"]
-6316 Explodability	-01 only: "The MCPA Ester 4 product is not composed of explosive components and therefore does not exhibit explosive characteristics. Albaugh, Inc. <b>requests a waiver</b> for this data requirement."
-6317 Storage Stability	-01 only: "The analysis of the one-year storage stability is currently under protocol. The final report will be submitted approximately one year from initial storage of the sample. As a result, Albaugh, Inc. requests that a conditional registration for MCPA Ester 4 be granted on the submission of these data." <b>DATA GAP: Awaiting data from registrant.</b> Registrant currently has a Conditional Registration, and is undergoing the reregistration process to maintain this Conditional Registration.
-6319 Miscibility	-01 only: "The MCPA Ester 4 product is not intended to be diluted with oil or other non-polar solvents. Albaugh, Inc. <b>requests a waiver</b> for this data requirement."
-6320 Corrosion Characteristics	-01 only: "The evaluation of corrosion characteristics over a one-year period is currently under protocol and is being conducted concurrently with storage stability, Guideline 830-6317. The final report will be submitted approximately one year from initial storage of the sample. As a result, Albaugh, Inc. requests that a conditional registration for MCPA Ester 4 be granted on the submission of these data." <b>DATA GAP: Awaiting data from registrant.</b> Registrant currently has a Conditional Registration, and is undergoing the reregistration process to maintain this Conditional Registration.
-6321 Dielectric Breakdown Voltage	-01 only: "MCPA Ester 4 is not intended for use around electrical equipment. Albaugh, Inc. <b>requests a waiver</b> for this data requirement."
-7000 pH	"3.58 ± 0.01" [Block 8 on CSFs: "3.6"]
-7100 Viscosity	"10.798 cST @ 20° C; 5.419 cST @ 40° C"
-7300 Density/Relative Density/Bulk Density	"0.988 g/ml" [Block 7 on CSFs: "0.988 g/ml"]





DATE OUT: August 10, 2007

SUBJECT: **REVISED PRODUCT CHEMISTRY REVIEW OF:** Technical Product [ ],  
Manufacturing Use Product [ ],  
End Use Product [ X ]

BARCODE No.: D340565

EPA RECEIVED DATE: 08-10-07

EPA Reg. No.: 42750-23

PRODUCT NAME: MCPA ESTER 4

MRIDs: [none new, but revised Alternate CSF]

COMPANY NAME: Albaugh, Inc.

Action Code: 674

FROM: Bentley C. Gregg, Product Chemist  
Product Chemistry Team  
PRB/SRRD (7508P)

*Bentley C. Gregg*  
*8/10/07*

TO: Veronica Dutch, CRM  
Product Reregistration Branch  
Special Review and Reregistration Division (7508P)

**INTRODUCTION:**

In response to an earlier Product Chemistry review (August 1, 2007; Bentley C. Gregg), the registrant, Albaugh, Inc., has submitted a revised Alternate Confidential Statement of Formula (CSF, dated 8/10/07), and is requesting FIFRA Section 4 reregistration of their end-use product, MCPA Ester 4, EPA Reg. No. 42750-23.

**FINDINGS:**

1. The registrant had previously satisfied all the data requirements for the physical and chemical properties of MCPA Ester 4, except for **Storage Stability (Guideline 830-6317)** and **Corrosion Characteristics (Guideline 830-6320)**. The registrant request for waiver from the requirement for submitting these data is herein accepted, and all physical and chemical properties data are now acceptable for MCPA Ester 4.
2. The registrant had submitted an acceptable Basic CSF (dated 9/8/06). The registrant has now submitted a revised Alternate CSF (dated 8/10/07), with amounts now listed for the active ingredient and all listed inert ingredients. The revised Alternate CSF indicates that this Alternate will be formulated with [REDACTED], having a reported concentration of [REDACTED] to achieve a nominal concentration of their end-use product of 69.70% (of 2-ethylhexyl ester of 2-methyl-4-chloro-phenoxyacetic acid). This is the amount listed on the Basic CSF, as well as that reported in OPPIN Query and on the submitted label [which also lists an acid equivalent (AE) concentration of 44.7%]. The Upper and Lower Certified Limits reported on this Alternate CSF are found to be acceptable, for the active ingredient and each of the inert ingredients. The inert ingredients are each cleared for food-use, and have exemptions from the requirement for a tolerance.

**CONCLUSIONS:**

With the waiving of Storage Stability and Corrosion Characteristics data (Finding 1) and the submission of an Alternate CSF (Finding 2), the registrant has satisfied the product chemistry requirements for reregistration of their end-use product, **MCPA ESTER 4, Reg. No. 42750-23.**

Reviewer and Central File (Reg. No. 42750-23).

7508P:SRRD:PRB:PY1:B.C.G.:08/10/07:703-308-8178:<42750-23>

DATE OUT: August 1, 2007

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: Technical Product [ ],  
Manufacturing Use Product [ ],  
End Use Product [ X ]

BARCODE No.: D340565

EPA RECEIVED DATE: 09-11-06

EPA Reg. No.: 42750-23

PRODUCT NAME: MCPA ESTER 4

MRIDs: 469306-01, 469306-02, 469306-03

COMPANY NAME: Albaugh, Inc.

Action Code: 674

FROM: Bentley C. Gregg, Product Chemist  
Product Chemistry Team  
PRB/SRRD (7508P)

*Bentley C. Gregg Aug. 1, 2007*

TO: Veronica Dutch, CRM  
Product Reregistration Branch  
Special Review and Reregistration Division (7508P)

#### **INTRODUCTION:**

The registrant, Albaugh, Inc., has submitted two revised Confidential Statement of Formula (CSFs, a Basic and an Alternate Formulation, both dated 9/8/06), a revised label (Agency pin-punched received date: 9-11-06), and three new MRIDs (469306-01, -02, and -03) containing product chemistry data, and is requesting FIFRA Section 4 reregistration of their end use product, MCPA Ester 4, EPA Reg. No. 42750-23.

A Reregistration Eligibility Decision (RED), Case # 0017, was issued in September 2004 for the Technical Grade Active Ingredient (TGAI) MCPA (2-methyl-4-chlorophenoxyacetic acid), and the RED included this active ingredient with the 2-ethylhexyl ester, which, thus, has the following chemical name: 2-ethylhexyl ester of 2-methyl-4-chlorophenoxyacetic acid (OPP Chemical Code 030564). The RED indicated that the existing available generic data concerning the physical/chemical properties of the active ingredient were acceptable, but that additional data were required for the specific products, including a revised CSF, a revised product label, and additional data regarding the product chemistry (such as production methods, analytical procedures, and physical and chemical properties data). The registrant has now submitted these data for their TGAI product.

#### **FINDINGS:**

1. The registrant submitted MRID 469306-01 and -03 for the physical and chemical properties of MCPA Ester 4. Certain data requirements are listed as requesting a waiver, each of which are being granted herein; thus, the data are deemed to be acceptable for the physical and chemical properties, except for **Storage Stability (Guideline 830-6317) and Corrosion Characteristics (Guideline 830-6320)**. The registrant is requested to submit these data as soon as possible.
2. The registrant has submitted MRID 469306-01 and -02 to provide information to satisfy the data requirements for this end-use product regarding the following Guidelines: 830-1550, Product Identity and Composition; 830-1600, Description of Materials Used to Produce the Product; 830-1650, Description of Formulation Process; and 830-1670, Discussion of Formation of Impurities. This information is deemed acceptable.

3. MRID 469306-02 lists the Enforcement of Analytical Method, specifically a procedure involving high performance liquid chromatography (HPLC) with an ultraviolet detector, for the quantification of the 2-ethylhexyl ester of MCPA.
4. The registrant has submitted a Basic and an Alternate CSF (both dated 9/8/06). [Note that the Alternate is only incompletely filled out, with no amounts listed for either the active ingredient or the last listed inert ingredient; therefore, only the Basic CSF will be reviewed in detail, until such time as the registrant makes the necessary additions to the Alternate CSF.] The Basic CSF indicates that the end-use product formulation utilizes Technical 2-Ethylhexyl Ester of MPCA (EPA Reg. No. 15440-9). This TGAI is incorporated to achieve a nominal concentration of 69.70% for the 2-ethylhexyl ester of 2-methyl-4-chloro-phenoxyacetic acid. This is the amount listed on the submitted label and reported in OPPIN Query, with the label also listing an acid equivalent (AE) concentration of 44.7%. The Upper and Lower Certified Limits reported on the Basic CSF are found to be acceptable, for both the active ingredient and the inert ingredients. The inert ingredients are each cleared for food-use, and have exemptions from the requirement for a tolerance.
5. The Physical or Chemical Hazard statement and the Storage and Disposal statement on the submitted label (Agency pin-punched received date: 9-11-06) appear to satisfy the requirements in the recent Label Review Manual. (It is expected that this issue will be more thoroughly clarified during the PRB Label Assessment Team review.)

#### **CONCLUSIONS:**

Once the registrant has provided the required Storage Stability and Corrosion Characteristics data (Finding 1), and if necessary, has submitted a more completely filled out Alternate CSF (Finding 4), the registrant will have satisfied the product chemistry requirements for reregistration of their end-use product, **MCPA ESTER 4, Reg. No. 42750-23**.



**REVIEW OF PRODUCT CHEMISTRY DATA:**

**PRODUCT NAME: MCPA Ester 4; EPA Reg. No.: 42750-23**

**Group A: Series 830-Product Identity, Composition, and Analysis (40 CFR 158.155, .160, .165, .167, .170, .175 & .180).**

**830-1550 Product Identity and Composition**

The registrant has submitted a Basic and an Alternate CSF (both 9/8/06) [however, the Alternate is not fully filled out, and thus, only the Basic is being reviewed]. The Basic CSF states that the end-use product, MCPA Ester 4, has a nominal concentration of the 2-ethylhexyl ester of MCPA of 69.70%, with 69.7% also listed on the revised label submitted, and with an acid equivalent (AE) of 44.7% also listed on the label. The 69.7% nominal concentration is also listed in OPPIN Query. The Lower and Upper Certified Limits listed on the Basic CSF for the active ingredient are also deemed acceptable, based on calculations utilizing the Agency regulations at 40 CFR 158.175 (b)(2).

**830-1600 Description of Materials Used to Produce the Product**

Refer to Confidential Appendix A.

**830-1650 Discussion of Formulation Process**

Refer to Confidential Appendix A.

**830-1670 Discussion of Formation of Impurities**

Refer to Confidential Appendix A.

**830-1700 Preliminary Analysis**

Refer to Confidential Appendix A.

**830-1800 Enforcement of Analytical Method**

The registrant has submitted MRID 469306-02, which includes a very brief listing of the details of the Enforcement of Analytical Method. This analytical method involves high performance liquid chromatography with an ultraviolet detector (280 nm), with the quantification of the active ingredient achieved relative to a reference standard of the MCPA ethyl-hexyl ester having a known purity, with the samples and standards dissolved in an acetonitrile/water mixture (35/65; that is, 35% acetonitrile and 65% water, which has been acidified with 2% acetic acid). The document contains a description of HPLC operating conditions, the injection volume and procedures, and the calculation equations.

**Group B: Series 830- Physical and Chemical Properties (40 CFR 158.190)**  
**MCPA Ester 4 (EPA Reg. No. 42750-23)**  
**Both MRID 469306-01 and -03 (both dated 2006), unless otherwise indicated**

<b>GUIDELINE REFERENCE NUMBER (GRN) / TITLE 830-</b>	<b>VALUE OR QUALITATIVE DESCRIPTION/ METHOD(S) USED WHERE APPLICABLE AND REFERENCES</b>
-6302 Color	"Amber"
-6303 Physical State	"Clear liquid"
-6304 Odor	"Fuel oil odor"
-6314 Oxidation/Reduction: Chemical Incompatibility	"Compatible with water, [10%] monoammonium phosphate, iron powder, kerosene, and [10%] potassium permanganate." Minimal changes in temperature were observed in testing with each of these five reactants.
-6315 Flammability/Flame Extension	"68.6 ± 0.5°C" [Block 9 on CSFs: "68 C"]
-6316 Explodability	-01 only: "The MCPA Ester 4 product is not composed of explosive components and therefore does not exhibit explosive characteristics. Albaugh, Inc. <b>requests a waiver</b> for this data requirement."
-6317 Storage Stability	-01 only: "The analysis of the one-year storage stability is currently under protocol. The final report will be submitted approximately one year from initial storage of the sample. As a result, Albaugh, Inc. requests that a conditional registration for MCPA Ester 4 be granted on the submission of these data." <b>DATA GAP: Awaiting data from registrant.</b> Registrant currently has a Conditional Registration, and is undergoing the reregistration process to maintain this Conditional Registration.
-6319 Miscibility	-01 only: "The MCPA Ester 4 product is not intended to be diluted with oil or other non-polar solvents. Albaugh, Inc. <b>requests a waiver</b> for this data requirement."
-6320 Corrosion Characteristics	-01 only: "The evaluation of corrosion characteristics over a one-year period is currently under protocol and is being conducted concurrently with storage stability, Guideline 830-6317. The final report will be submitted approximately one year from initial storage of the sample. As a result, Albaugh, Inc. requests that a conditional registration for MCPA Ester 4 be granted on the submission of these data." <b>DATA GAP: Awaiting data from registrant.</b> Registrant currently has a Conditional Registration, and is undergoing the reregistration process to maintain this Conditional Registration.
-6321 Dielectric Breakdown Voltage	-01 only: "MCPA Ester 4 is not intended for use around electrical equipment. Albaugh, Inc. <b>requests a waiver</b> for this data requirement."
-7000 pH	"3.58 ± 0.01" [Block 8 on CSFs: "3.6"]
-7100 Viscosity	"10.798 cST @ 20° C; 5.419 cST @ 40° C"
-7300 Density/Relative Density/Bulk Density	"0.988 g/ml" [Block 7 on CSFs: "0.988 g/ml"]





DATE OUT: August 1, 2007

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: Technical Product [ ],  
Manufacturing Use Product [ ],  
End Use Product [ X ]

BARCODE No.: D340565

EPA RECEIVED DATE: 09-11-06

EPA Reg. No.: 42750-23

PRODUCT NAME: MCPA ESTER 4

MRIDs: 469306-01, 469306-02, 469306-03

COMPANY NAME: Albaugh, Inc.

Action Code: 674

FROM: Bentley C. Gregg, Product Chemist  
Product Chemistry Team  
PRB/SRRD (7508P)

*Bentley C. Gregg Aug. 1, 2007*

TO: Veronica Dutch, CRM  
Product Reregistration Branch  
Special Review and Reregistration Division (7508P)

#### INTRODUCTION:

The registrant, Albaugh, Inc., has submitted two revised Confidential Statement of Formula (CSFs, a Basic and an Alternate Formulation, both dated 9/8/06), a revised label (Agency pin-punched received date: 9-11-06), and three new MRIDs (469306-01, -02, and -03) containing product chemistry data, and is requesting FIFRA Section 4 reregistration of their end use product, MCPA Ester 4, EPA Reg. No. 42750-23.

A Reregistration Eligibility Decision (RED), Case # 0017, was issued in September 2004 for the Technical Grade Active Ingredient (TGAI) MCPA (2-methyl-4-chlorophenoxyacetic acid), and the RED included this active ingredient with the 2-ethylhexyl ester, which, thus, has the following chemical name: 2-ethylhexyl ester of 2-methyl-4-chlorophenoxyacetic acid (OPP Chemical Code 030564). The RED indicated that the existing available generic data concerning the physical/chemical properties of the active ingredient were acceptable, but that additional data were required for the specific products, including a revised CSF, a revised product label, and additional data regarding the product chemistry (such as production methods, analytical procedures, and physical and chemical properties data). The registrant has now submitted these data for their TGAI product.

#### FINDINGS:

1. The registrant submitted MRID 469306-01 and -03 for the physical and chemical properties of MCPA Ester 4. Certain data requirements are listed as requesting a waiver, each of which are being granted herein; thus, the data are deemed to be acceptable for the physical and chemical properties, except for **Storage Stability (Guideline 830-6317) and Corrosion Characteristics (Guideline 830-6320)**. The registrant is requested to submit these data as soon as possible.
2. The registrant has submitted MRID 469306-01 and -02 to provide information to satisfy the data requirements for this end-use product regarding the following Guidelines: 830-1550, Product Identity and Composition; 830-1600, Description of Materials Used to Produce the Product; 830-1650, Description of Formulation Process; and 830-1670, Discussion of Formation of Impurities. This information is deemed acceptable.

3. MRID 469306-02 lists the Enforcement of Analytical Method, specifically a procedure involving high performance liquid chromatography (HPLC) with an ultraviolet detector, for the quantification of the 2-ethylhexyl ester of MCPA.
4. The registrant has submitted a Basic and an Alternate CSF (both dated 9/8/06). [Note that the Alternate is only incompletely filled out, with no amounts listed for either the active ingredient or the last listed inert ingredient; therefore, only the Basic CSF will be reviewed in detail, until such time as the registrant makes the necessary additions to the Alternate CSF.] The Basic CSF indicates that the end-use product formulation utilizes Technical 2-Ethylhexyl Ester of MPCA (EPA Reg. No. 15440-9). This TGAI is incorporated to achieve a nominal concentration of 69.70% for the 2-ethylhexyl ester of 2-methyl-4-chloro-phenoxyacetic acid. This is the amount listed on the submitted label and reported in OPPIN Query, with the label also listing an acid equivalent (AE) concentration of 44.7%. The Upper and Lower Certified Limits reported on the Basic CSF are found to be acceptable, for both the active ingredient and the inert ingredients. The inert ingredients are each cleared for food-use, and have exemptions from the requirement for a tolerance.
5. The Physical or Chemical Hazard statement and the Storage and Disposal statement on the submitted label (Agency pin-punched received date: 9-11-06) appear to satisfy the requirements in the recent Label Review Manual. (It is expected that this issue will be more thoroughly clarified during the PRB Label Assessment Team review.)

**CONCLUSIONS:**

Once the registrant has provided the required Storage Stability and Corrosion Characteristics data (Finding 1), and if necessary, has submitted a more completely filled out Alternate CSF (Finding 4), the registrant will have satisfied the product chemistry requirements for reregistration of their end-use product, **MCPA ESTER 4, Reg. No. 42750-23.**

**REVIEW OF PRODUCT CHEMISTRY DATA:**

**PRODUCT NAME: MCPA Ester 4; EPA Reg. No.: 42750-23**

**Group A: Series 830-Product Identity, Composition, and Analysis (40 CFR 158.155, .160, .165, .167, .170, .175 & .180).**

**830-1550 Product Identity and Composition**

The registrant has submitted a Basic and an Alternate CSF (both 9/8/06) [however, the Alternate is not fully filled out, and thus, only the Basic is being reviewed]. The Basic CSF states that the end-use product, MCPA Ester 4, has a nominal concentration of the 2-ethylhexyl ester of MCPA of 69.70%, with 69.7% also listed on the revised label submitted, and with an acid equivalent (AE) of 44.7% also listed on the label. The 69.7% nominal concentration is also listed in OPPIN Query. The Lower and Upper Certified Limits listed on the Basic CSF for the active ingredient are also deemed acceptable, based on calculations utilizing the Agency regulations at 40 CFR 158.175 (b)(2).

**830-1600 Description of Materials Used to Produce the Product**

Refer to Confidential Appendix A.

**830-1650 Discussion of Formulation Process**

Refer to Confidential Appendix A.

**830-1670 Discussion of Formation of Impurities**

Refer to Confidential Appendix A.

**830-1700 Preliminary Analysis**

Refer to Confidential Appendix A.

**830-1800 Enforcement of Analytical Method**

The registrant has submitted MRID 469306-02, which includes a very brief listing of the details of the Enforcement of Analytical Method. This analytical method involves high performance liquid chromatography with an ultraviolet detector (280 nm), with the quantification of the active ingredient achieved relative to a reference standard of the MCPA ethyl-hexyl ester having a known purity, with the samples and standards dissolved in an acetonitrile/water mixture (35/65; that is, 35% acetonitrile and 65% water, which has been acidified with 2% acetic acid). The document contains a description of HPLC operating conditions, the injection volume and procedures, and the calculation equations.

**Group B: Series 830- Physical and Chemical Properties (40 CFR 158.190)**  
**MCPA Ester 4 (EPA Reg. No. 42750-23)**  
**Both MRID 469306-01 and -03 (both dated 2006), unless otherwise indicated**

<b>GUIDELINE REFERENCE NUMBER (GRN) / TITLE 830-</b>	<b>VALUE OR QUALITATIVE DESCRIPTION/ METHOD(S) USED WHERE APPLICABLE AND REFERENCES</b>
-6302 Color	"Amber"
-6303 Physical State	"Clear liquid"
-6304 Odor	"Fuel oil odor"
-6314 Oxidation/Reduction: Chemical Incompatibility	"Compatible with water, [10%] monoammonium phosphate, iron powder, kerosene, and [10%] potassium permanganate." Minimal changes in temperature were observed in testing with each of these five reactants.
-6315 Flammability/Flame Extension	"68.6 ± 0.5°C" [Block 9 on CSFs: "68 C"]
-6316 Explodability	-01 only: "The MCPA Ester 4 product is not composed of explosive components and therefore does not exhibit explosive characteristics. Albaugh, Inc. <b>requests a waiver</b> for this data requirement."
-6317 Storage Stability	-01 only: "The analysis of the one-year storage stability is currently under protocol. The final report will be submitted approximately one year from initial storage of the sample. As a result, Albaugh, Inc. requests that a conditional registration for MCPA Ester 4 be granted on the submission of these data." <b>DATA GAP: Awaiting data from registrant.</b> Registrant currently has a Conditional Registration, and is undergoing the reregistration process to maintain this Conditional Registration.
-6319 Miscibility	-01 only: "The MCPA Ester 4 product is not intended to be diluted with oil or other non-polar solvents. Albaugh, Inc. <b>requests a waiver</b> for this data requirement."
-6320 Corrosion Characteristics	-01 only: "The evaluation of corrosion characteristics over a one-year period is currently under protocol and is being conducted concurrently with storage stability, Guideline 830-6317. The final report will be submitted approximately one year from initial storage of the sample. As a result, Albaugh, Inc. requests that a conditional registration for MCPA Ester 4 be granted on the submission of these data." <b>DATA GAP: Awaiting data from registrant.</b> Registrant currently has a Conditional Registration, and is undergoing the reregistration process to maintain this Conditional Registration.
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-7000 pH	"3.58 ± 0.01" [Block 8 on CSFs: "3.6"]
-7100 Viscosity	"10.798 cST @ 20° C; 5.419 cST @ 40° C"
-7300 Density/Relative Density/Bulk Density	"0.988 g/ml" [Block 7 on CSFs: "0.988 g/ml"]





MRID	MRID Status	Citation Reference	Guideline
46930601		Moyer, J. (2006) MCPA Ester 4: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 7 p.	830.1550/Product Identity and composition
46930601		Moyer, J. (2006) MCPA Ester 4: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 7 p.	830.1600/Description of materials used to produce the product
46930601		Moyer, J. (2006) MCPA Ester 4: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 7 p.	830.1650/Description of formulation process
46930601		Moyer, J. (2006) MCPA Ester 4: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 7 p.	830.1670/Discussion of formation of impurities
46930601		Moyer, J. (2006) MCPA Ester 4: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 7 p.	830.1750/Certified limits
46930601		Moyer, J. (2006) MCPA Ester 4: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 7 p.	830.1800/Enforcement analytical method
46930601		Moyer, J. (2006) MCPA Ester 4: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 7 p.	830.6302/Color
46930601		Moyer, J. (2006) MCPA Ester 4: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 7 p.	830.6303/Physical state
46930601		Moyer, J. (2006) MCPA Ester 4: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 7 p.	830.6304/Odor
46930601		Moyer, J. (2006) MCPA Ester 4: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 7 p.	830.6314/Oxidizing or reducing action
46930601		Moyer, J. (2006) MCPA Ester 4: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 7 p.	830.6315/Flammability
46930601		Moyer, J. (2006) MCPA Ester 4: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 7 p.	830.7000/pH of water solutions or suspensions
46930601		Moyer, J. (2006) MCPA Ester 4: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 7 p.	830.7100/Viscosity
46930601		Moyer, J. (2006) MCPA Ester 4: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 7 p.	830.7300/Density/relative density
46930602		Moyer, J. (2006) Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Formulation Process, Discussion of Formation of Impurities, Certified Limits, and Enforcement Analytical Method for MCPA Ester 4 End-Use Product. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 52 p.	830.1550/Product Identity and composition
46930602		Moyer, J. (2006) Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Formulation Process, Discussion of Formation of Impurities, Certified Limits, and Enforcement Analytical Method for MCPA Ester 4 End-Use Product. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 52 p.	830.1600/Description of materials used to produce the product
46930602		Moyer, J. (2006) Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Formulation Process, Discussion of Formation of Impurities, Certified Limits, and Enforcement Analytical Method for MCPA Ester 4 End-Use Product. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 52 p.	830.1650/Description of formulation process
46930602		Moyer, J. (2006) Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Formulation Process, Discussion of Formation of Impurities, Certified Limits, and Enforcement Analytical Method for MCPA Ester 4 End-Use Product. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 52 p.	830.1670/Discussion of formation of impurities
46930602		Moyer, J. (2006) Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Formulation Process, Discussion of Formation of Impurities, Certified Limits, and Enforcement Analytical Method for MCPA Ester 4 End-Use Product. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 52 p.	830.1750/Certified limits

DP#: (340565)

\* Guideline Listing \*\*\*

Decision #:

Guideline Name

Storage stability of product

Description of materials used to produce the product

Discussion of formation of impurities

Preliminary analysis

Stability to sunlight, normal and elevated temperatures, metals, and metal

Viscosity

Physical state

Product Identity and composition

UV/Visible absorption

Certified limits

pH of water solutions or suspensions

Enforcement analytical method

Corrosion characteristics

Description of formulation process

Dielectric breakdown voltage

Odor

Description of production process

Color

Guideline Name

Storage stability of product

Description of materials used to produce the product

Discussion of formation of impurities

Preliminary analysis

Stability to sunlight, normal and elevated temperatures, metals, and metal

Viscosity

Physical state

Product Identity and composition

UV/Visible absorption

Certified limits

pH of water solutions or suspensions

Enforcement analytical method

Corrosion characteristics

Description of formulation process

Dielectric breakdown voltage

Odor

Description of production process

Color



MFID	MFID Status	Citation Reference	Guideline
46930602		Moyer, J. (2006) Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Formulation Process, Discussion of Formation of Impurities, Certified Limits, and Enforcement Analytical Method for MCPA Ester 4 End-Use Product. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 52 p.	830.1800/Enforcement analytical method
46930603		Wo, C. (2006) Physical and Chemical Characteristics: Color, Physical State, Odor, Oxidation/Reduction, Flammability, pH, Viscosity, and Density/Relative Density: MCPA Ester 4. Project Number: 20124, P801. Unpublished study prepared by Product Safety Laboratories. 17 p.	830.6302/Color
46930603		Wo, C. (2006) Physical and Chemical Characteristics: Color, Physical State, Odor, Oxidation/Reduction, Flammability, pH, Viscosity, and Density/Relative Density: MCPA Ester 4. Project Number: 20124, P801. Unpublished study prepared by Product Safety Laboratories. 17 p.	830.6303/Physical state
46930603		Wo, C. (2006) Physical and Chemical Characteristics: Color, Physical State, Odor, Oxidation/Reduction, Flammability, pH, Viscosity, and Density/Relative Density: MCPA Ester 4. Project Number: 20124, P801. Unpublished study prepared by Product Safety Laboratories. 17 p.	830.6304/Odor
46930603		Wo, C. (2006) Physical and Chemical Characteristics: Color, Physical State, Odor, Oxidation/Reduction, Flammability, pH, Viscosity, and Density/Relative Density: MCPA Ester 4. Project Number: 20124, P801. Unpublished study prepared by Product Safety Laboratories. 17 p.	830.6314/Oxidizing or reducing action
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46930603		Wo, C. (2006) Physical and Chemical Characteristics: Color, Physical State, Odor, Oxidation/Reduction, Flammability, pH, Viscosity, and Density/Relative Density: MCPA Ester 4. Project Number: 20124, P801. Unpublished study prepared by Product Safety Laboratories. 17 p.	830.7100/Viscosity
46930603		Wo, C. (2006) Physical and Chemical Characteristics: Color, Physical State, Odor, Oxidation/Reduction, Flammability, pH, Viscosity, and Density/Relative Density: MCPA Ester 4. Project Number: 20124, P801. Unpublished study prepared by Product Safety Laboratories. 17 p.	830.7300/Density/relative density



MRID	MRID Status	Citation Reference	Guideline
46930601		Moyer, J. (2006) MCPA Ester 4: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 7 p.	830.1550/Product Identity and composition
46930601		Moyer, J. (2006) MCPA Ester 4: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 7 p.	830.1600/Description of materials used to produce the product
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46930601		Moyer, J. (2006) MCPA Ester 4: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 7 p.	830.1670/Discussion of formation of impurities
46930601		Moyer, J. (2006) MCPA Ester 4: Summary of OPPTS 830.1000 Series Product Properties Test Guidelines. Project Number: ALB06/19. Unpublished study prepared by Albaugh Inc. 7 p.	830.1750/Certified limits
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41992301

1

FitzGerald, G. (1991) Acute Oral Toxicity Study (LD50): MCPA  
Ester 4: Lab Project Number: 90G-0707. Unpublished study  
prepared by Toxicon Corp. 22 p.

870.1100/Acute oral toxicity

DP#: (340568)

\* Guideline Listing \* \* \*

Decision #:

Guideline Name

Acute dermal irritation

Skin sensitization

Acute dermal toxicity

Acute inhalation toxicity

Acute Oral Toxicity

Acute eye irritation

## Guideline Name

Acute dermal irritation

Skin sensitization

Acute dermal toxicity

Acute inhalation toxicity

Acute Oral Toxicity

Acute eye irritation



MRID	MRID Status	Citation Reference	Guideline
41992301		FitzGerald, G. (1991) Acute Oral Toxicity Study (LD50): MCPA Ester 4: Lab Project Number: 90G-0707. Unpublished study prepared by Toxicon Corp. 22 p.	870.1100/Acute oral toxicity



United States  
**Environmental Protection Agency**  
 Office of Pesticide Programs (7505C)  
 Washington, DC 20460

**Notice of Supplemental Distribution of a Registered Pesticide Product**

**Instructions**

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product  
 42750-23

Distributor Company Number  
 55467

**Note: Do not submit distributor product labels**

Name of Registered Product (basic product name accepted by EPA)  
 Albaugh MCPA Ester 4

Distributor Product Name  
 Tenkoz MCPA Ester 4

Name and Address of Distributor (Type; include ZIP code)  
 Tenkoz, Inc.  
 100 North Point Center East  
 Alpharetta, GA 30022

**Read All Conditions Before Signing**

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

**Distributor**

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

*Robert E. Riddsdale*

Agent/Tenkoz Inc.

Date

05/11/07

**Registrant**

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

*Mark [Signature]*

Registrations  
 Manager

Date

5/11/07



Intranet Daemon Owner  
<idaemon@unixmail.rtpnc.epa.gov>

02/02/2007 11:11 AM

To Information Services Center@EPA

cc

bcc

Subject (032111100) ISC: Document Request

56-463  
2-207  
1125 BQ

1\_Name:Veronica Dutch  
2\_Phone:308-8585  
3\_Email:Dutch.Veronica@epa.gov  
4\_Division:SRRD/PRB  
5\_Service Request:Paper  
6a\_Type of Document:MRID  
7\_Reason for Request:Re-Registration  
Display:yes  
Document(s) Requested:Please prepare the blowback for MCPA EPA Reg# 42750-23  
for acute tox data.

MRID Number 42750-23

41992301

Should you have any questions please contact Veronica Dutch at 703-308-8585.  
Thank you.  
Submit:Send

-----  
WARNING NOTICE

This electronic mail originated from a federal government computer system of the United States Environmental Protection Agency (EPA). Unauthorized access or use of this EPA system may subject violators to criminal, civil and/or administrative action. For official purposes, law enforcement and other authorized personnel may monitor, record, read, copy and disclose all information which an EPA system processes. Any person's access or use, authorized and unauthorized, of this EPA system to send electronic mail constitutes consent to these terms.

T-2P

-----  
This information is for tracking purposes only.

Submitting script: /cgi-bin/mail.cgi

Submitting host: (161.80.149.111)

Browser: Mozilla/4.0 (compatible; MSIE\*6.0; Windows NT 5.1; SV1; InfoPath.1; .NET CLR 1.1.4322; .NET CLR 2.0.50727)

Referred:

[http://intranet.epa.gov/pesticides/tech\\_services/information/infosevctrfrm.htm](http://intranet.epa.gov/pesticides/tech_services/information/infosevctrfrm.htm)

TSSMS: opp00002

Mail to File: doc\_request  
-----

2-2-07  
2:10  
G. Johnson



✓D

Date: 9/18/04

**OPPIN  
PDCI RESPONSES  
INPROCESSING FORM**

**CASE NUMBER:**

MCDA 030564

**REG. NUMBER(s):**

42750-23

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

*Circle appropriate submission/response code:*

**SUBMISSION TYPE:**

90-day Response

8 Month Response

**RESPONSE CODE:**

*(For 90-day responses)*

1125 – Objection - Incomplete Response

1265 – Product Reregistration to be Supported

1315 – Pending Cancellation (Voluntary Cancellation)

1410 – Notice of Intent to Suspend

*(For 8 month responses)*

1125 – Objection -Incomplete Response

1130 – Objection- Data Deficiency

1315 – Pending Cancellation (Voluntary Cancellation)

1410 – Notice of Intent to Suspend





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

September 12, 2006

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

ALBAUGH INC  
PO Box 2127  
VALDOSTA, GA 31604-2127

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 11-SEPT-06. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



CORPORATE OFFICE  
1525 NE 36th Street  
Ankeny, IA 50021  
515.964.9444 (Phone)  
800.247.8013 (Toll Free)  
515.964.7813 (FAX)



**469306-00**  
ALBAUGH, INC. — VALDOSTA  
304 Janet Street, Suite H  
Valdosta, Georgia 31602  
229.244.3288 (Direct Dial)  
229.244.5841 (FAX)

FEDERAL EXPRESS

September 8, 2006

Document Processing Desk  
Ms. Bonnie Adler, Chemical Review Manager  
Special Review and Reregistration Branch (7508P)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
2777 South Crystal Dr.  
Arlington, VA 22202

RE: MCPA Ester 4  
EPA Reg. No. 42750-23

Dear Ms. Adler,

The enclosed submission is Albaugh's 8-Month response to the MCPA RED for the above referenced registration. Documents enclosed are detailed on the attached transmittal page.

Please call if you have any questions.

Regards,

A handwritten signature in black ink, appearing to read "Morris Gaskins", is written over a horizontal line.

Morris Gaskins  
Registrations Manager  
Albaugh, Inc.  
229-244-3288

**Agri Star**™  
By Albaugh, Inc.

PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS  
[www.albaughinc.com](http://www.albaughinc.com)

## TRANSMITTAL DOCUMENT

### Name and address of submitter:

Albaugh, Inc.  
P.O. Box 2127  
Valdosta, GA 31604-2127

**Company Official:** Morris Gaskins

**Telephone:** (229) 244-3288

### Regulatory action for which this package is submitted:

8-Month response to MCPA RED for MCPA Ester 4 (EPA Reg. No. 42750-23)

**Transmittal Date:** September 8, 2006

### List of items submitted:

- Transmittal page
- Cover letter
- 8570-1 application form
- 8570-34 Certification With Respect to Citation of Data form
- 8570-27 Formulators Exemption form
- 8570-35 Data Matrix (internal use copy)
- 8570-35 Data Matrix (public file copy)
- Draft label (marked up with changes) (1 copy)
- Draft label (clean) (5 copies)
- Basic CSF (2 copies)

**46930601** • Summary of OPPTS 830.1000 Series Product Properties Test Guidelines (3 copies)

**46930602** • Series 830-A Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Formulation Process, Discussion of Formation of Impurities, Certified Limits, and Enforcement Analytical Method (OPPTS Guidelines 830.1550, 830.1600, 830.1650, 830.1670, 830.1750 and 830.1800) (3 copies)

**46930603** • Series 830-B Physical and Chemical Characteristics (OPPTS Guidelines 830.6302, 830.6303, 830.6304, 830.6314, 830.6315, 830.7000, 830.7100, and 830.7300) (3 copies)



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M Street, S.W.**  
**WASHINGTON, D.C. 20460**

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

**Certification with Respect to Citation of Data**

Applicant's/Registrant's Name, Address, and Telephone Number Albaugh, Inc. P.O. Box 2127 Valdosta, GA 31604	EPA Registration Number/File Symbol 42750-23
Active Ingredient(s) and/or representative test compound(s) MCPA ethylhexyl ester	Date September 8, 2006
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) terrestrial food uses	Product Name MCPA Ester 4

**NOTE:** If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

**SECTION I: METHOD OF DATA SUPPORT** (Check one method only)

☒ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☐ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

**SECTION II: GENERAL OFFER TO PAY**

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

**SECTION III: CERTIFICATION**

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date Sept. 8, 2006	Typed or Printed Name and Title Morris Gaskins Registrations Manager
---------------	-----------------------	---

CORPORATE OFFICE  
1525 NE 36th Street  
Ankeny, IA 50021  
515.964.9444 (Phone)  
800.247.8013 (Toll Free)  
515.964.7813 (FAX)



**469306-00**  
ALBAUGH, INC. — VALDOSTA  
304 Janet Street, Suite H  
Valdosta, Georgia 31602  
229.244.3288 (Direct Dial)  
229.244.5841 (FAX)

FEDERAL EXPRESS

September 8, 2006

Document Processing Desk  
Ms. Bonnie Adler, Chemical Review Manager  
Special Review and Reregistration Branch (7508P)  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
2777 South Crystal Dr.  
Arlington, VA 22202

RE: MCPA Ester 4  
EPA Reg. No. 42750-23

Dear Ms. Adler,

The enclosed submission is Albaugh's 8-Month response to the MCPA RED for the above referenced registration. Documents enclosed are detailed on the attached transmittal page.

Please call if you have any questions.

Regards,

A handwritten signature in black ink, appearing to read 'Morris Gaskins', is written over a horizontal line.

Morris Gaskins  
Registrations Manager  
Albaugh, Inc.  
229-244-3288



PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS  
[www.albaughinc.com](http://www.albaughinc.com)

## TRANSMITTAL DOCUMENT

### Name and address of submitter:

Albaugh, Inc.  
P.O. Box 2127  
Valdosta, GA 31604-2127

**Company Official:** Morris Gaskins

**Telephone:** (229) 244-3288

### Regulatory action for which this package is submitted:

8-Month response to MCPA RED for MCPA Ester 4 (EPA Reg. No. 42750-23)

**Transmittal Date:** September 8, 2006

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**46930602** • Series 830-A Product Identity and Composition, Description of Materials Used to Produce the Product, Description of Formulation Process, Discussion of Formation of Impurities, Certified Limits, and Enforcement Analytical Method (OPPTS Guidelines 830.1550, 830.1600, 830.1650, 830.1670, 830.1750 and 830.1800) (3 copies)

**46930603** • Series 830-B Physical and Chemical Characteristics (OPPTS Guidelines 830.6302, 830.6303, 830.6304, 830.6314, 830.6315, 830.7000, 830.7100, and 830.7300) (3 copies)



# ALBAUGH, INC

469306-01

## STUDY TITLE

MCPA Ester 4

Summary of OPPTS 830.1000 Series Product Properties Test Guidelines

## DATA REQUIREMENTS

OPPTS Test Guidelines: 830.1550 – 830.7950

## AUTHOR

John M. Moyer

## STUDY DATE

September 5, 2006

## PERFORMING LABORATORY

N/A – No Analysis Performed

## PROJECT ID

ALB06-19

## SPONSOR

Albaugh, Inc.  
121 NE 18<sup>th</sup> Street  
Ankeny, IA 50021



PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS  
[www.albaughinc.com](http://www.albaughinc.com)



**STATEMENT OF DATA CONFIDENTIALITY CLAIMS:**

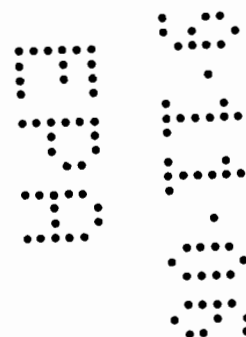
No claim of confidentiality is made for any information contained in this study on the basis of it falling within the scope of FIFRA Section 10 (d) (1) (A), (B) or (C).

Sponsor: Albaugh, Inc.

Sponsor's Agent: John M. Moyer

Sponsor's Agent Title: Project Chemist

Signature: *John M. Moyer* Date: 09/05/06



**GOOD LABORATORY PRACTICES COMPLIANCE STATEMENT:**

This study is a summary of descriptive information, and therefore, was not conducted in compliance with the requirements of the Good Laboratory Practice regulations (40 CFR, Part 160).

Study Director: John M. Moyer

Study Director's Title: Project Chemist

Signature: *John M. Moyer* Date: 09/05/06

Sponsor: Albaugh, Inc.

Sponsor's Agent: John M. Moyer

Sponsor's Agent Title: Project Chemist

Signature: *John M. Moyer* Date: 09/05/06

Submitter: Morris Gaskins

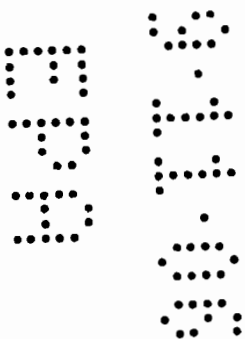
Submitter's Title: Registrations Manager

Signature: *Morris Gaskins* Date: 9/7/06



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**OPPTS Test Guidelines: 830.1550 – 830.7950:**

Test Guideline	Title	Summary
830.1550	Product identity and Composition	Please see Albaugh, Inc.'s OPPTS Product Properties Test Guidelines: Report ALB06-19
830.1600	Description of Materials Used to Produce the Product	Please see Albaugh, Inc.'s OPPTS Product Properties Test Guidelines: Report ALB06-19
830.1620	Description of the Production Process	This guideline is not applicable since the MCPA Ester 4 does not consist solely of the technical grade active ingredient or is it produced by an integrated system.
830.1650	Description of Formulation Process	Please see Albaugh, Inc.'s OPPTS Product Properties Test Guidelines: Report ALB06-19
830.1670	Discussion of Formation of Impurities	Please see Albaugh, Inc.'s OPPTS Product Properties Test Guidelines: Report ALB06-19
830.1700	Preliminary Analysis	This guideline is not applicable since the MCPA Ester 4 does not consist solely of the technical grade active ingredient or is it produced by an integrated system.
830.1750	Certified Limits	Please see Albaugh, Inc.'s OPPTS Product Properties Test Guidelines: Report ALB06-19
830.1800	Enforcement Analytical Method	Please see Albaugh, Inc.'s OPPTS Product Properties Test Guidelines: Report ALB06-19
830.1900	Submittal of Samples	As per Guideline 830.1900, the EPA requests samples on a case by case basis. Therefore, Albaugh, Inc. requests a waiver for this data requirement.
830.6302	Color	Reference: Please see Product Safety Laboratories' Physical and Chemical Characteristics: Report 20124  Results: Amber
830.6303	Physical State	Reference: Please see Product Safety Laboratories' Physical and Chemical Characteristics: Report 20124  Results: Clear Liquid
830.6304	Odor	Reference: Please see Product Safety Laboratories' Physical and Chemical Characteristics: Report 20124  Results: Fuel oil odor
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	As per OPPTS 830.1000, these data are not required for the registration of an end-use product.
830.6314	Oxidation/Reduction: Chemical Incompatibility	Reference: Please see Product Safety Laboratories' Physical and Chemical Characteristics: Report 20124  Results: Compatible with water, monoammonium phosphate, iron powder, kerosene and potassium permanganate.



830.6315	Flammability	Reference: Please see Product Safety Laboratories' Physical and Chemical Characteristics: Report 20124  Results: 68.6 C
830.6316	Explosibility	The MCPA Ester 4 product is not composed of explosive components and therefore does not exhibit explosive characteristics. Albaugh, Inc. requests a waiver for this data requirement.
830.6317	Storage Stability	The analysis of the one-year storage stability is currently under protocol. The final report will be submitted approximately one year from initial storage of the sample. As a result, Albaugh, Inc. requests that a conditional registration for MCPA Ester 4 be granted on the submission of these data.
830.6319	Miscibility	The MCPA Ester 4 product is not intended to be diluted with oil or other non-polar solvents. Albaugh, Inc. requests a waiver for this data requirement.
830.6320	Corrosion Characteristics	The evaluation of corrosion characteristics over a one-year period is currently under protocol and is being conducted concurrently with storage stability, Guideline 830.6317. The final report will be submitted approximately one year from initial storage of the sample. As a result, Albaugh, Inc. requests that a conditional registration for MCPA Ester 4 be granted on the submission of these data.
830.6321	Dielectric Breakdown Voltage	MCPA Ester 4 is not intended for use around electrical equipment. Albaugh, Inc. requests a waiver for this data requirement.
830.7000	pH	Reference: Please see Product Safety Laboratories' Physical and Chemical Characteristics: Report 20124  Results: 3.58
830.7050	UV/Visible Absorption	As per OPPTS 830.1000, these data are not required for the registration of an end-use product.
830.7100	Viscosity	Reference: Please see Product Safety Laboratories' Physical and Chemical Characteristics: Report 20124  Results: 10.798 cSt @ 20°C; 5.419 cSt @ 40°C
830.7200	Melting point / Melting Range	As per OPPTS 830.1000, these data are not required for the registration of an end-use product.
830.7220	Boiling Point / Boiling Range	As per OPPTS 830.1000, these data are not required for the registration of an end-use product.
830.7300	Density / Relative Density / Bulk Density	Reference: Reference: Please see Product Safety Laboratories' Physical and Chemical

		Characteristics: Report 20124
		Results: 0.988 g/ml
830.7370	Dissociation Constant	As per OPPTS 830.1000, these data are not required for the registration of an end-use product.
830.7550 830.7560 830.7570	Petition Coefficient	As per OPPTS 830.1000, these data are not required for the registration of an end-use product.
830.7840 830.7860	Water Solubility	As per OPPTS 830.1000, these data are not required for the registration of an end-use product.
830.7950	Vapor Pressure	As per OPPTS 830.1000, these data are not required for the registration of an end-use product.



EDITOR'S NOTE: Amendment for MCPA RED. Text to delete noted with ~~strikeout~~ and text to add is underlined.

ALBAUGH, INC.  
MCPA ESTER 4

HERBICIDE FOR SELECTIVE CONTROL OF CERTAIN WEEDS  
IN WHEAT, OATS, BARLEY, RYE, GRASSLAND AND IN NON-CROP AREAS

ACTIVE INGREDIENT:

2-ethylhexyl ester of 2-methyl-4-chlorophenoxyacetic acid\* ..... 69.7%

OTHER INGREDIENTS†: ..... 30.3%

TOTAL.....100.0%

\*Equivalent to 44.7% of 2-methyl-4-chlorophenoxyacetic acid isomer specific of not less than 3.7 pounds of 2-methyl-4-chlorophenoxyacetic acid isomer specific per gallon at 68°F. Isomer specific by AOAC Method.

†Contains petroleum distillates.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none"><li>• Immediately call a poison control center or doctor.</li><li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li><li>• Do not give any liquid to the person.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
IF INHALED:	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
Contains petroleum distillate - vomiting may cause aspiration pneumonia.	

See inside booklet for additional Precautionary Statements.

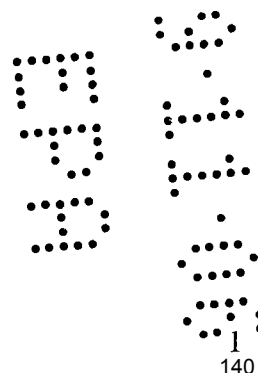
EPA Reg. No. 42750-23

EPA Est. No. 42750-MO-001

NET CONTENTS:

MANUFACTURED BY:  
Albaugh, Inc.  
Ankeny, Iowa 50021

FOR CHEMICAL SPILL, LEAK, FIRE, OR EXPOSURE  
CALL CHEMTREC (800) 424-9300



PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for Category E on an EPA chemical-resistance category selection chart.

Mixers, loaders, applicators, flaggers and other handlers must wear:

- Long-sleeved shirt and long pants,
- Chemical-resistant gloves when mixing, loading, or using any hand-held equipment. Category E, such as barrier laminate  $\geq$  14 mils, nitrile rubber  $\geq$  14 mils, neoprene rubber  $\geq$  14 mils, or viton  $\geq$  14 mils,
- Shoes plus socks, and
- Protective eyewear.

Additional PPE requirements for mixers and loaders supporting aerial application to rangelands, pasture lands, or noncropland. These mixers/loaders also must wear:

- A chemical resistant apron, and
- A NIOSH-approved respirator with a dist/mist filter with MSHA/NIOSH approval number prefix TC-21C or any N<sup>2</sup>, R, P, or HE filter.

See engineering controls for additional requirements.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROLS

Pilots must use an enclosed cockpit that meets the requirements listed in the WPS for agricultural pesticides [40 CFR 170.240(d)(6)]

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

## ENVIRONMENTAL HAZARDS

This pesticide may be toxic to fish, aquatic invertebrates and aquatic plants. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Runoff of this product will be reduced by avoiding applications when rainfall is forecasted to occur within 48 hours.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

~~Do not apply directly to water, or to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters. Do not apply when weather conditions favor drift from target area.~~

~~Spray equipment used in applying this product should be thoroughly cleaned before using for any other purposes. Use repeated flushing with soap and warm water or suitable chemical cleaner. It is best to use a separate sprayer for application of insecticides and fungicides.~~

~~This product will kill or seriously injure many desirable forms of vegetation. Do not apply directly to flowers, fruits, vegetables, grapes, ornamentals, cotton or other desirable plants. Do not use when there is hazard from drifting mists. (Coarse sprays are less likely to drift.) Vapors from this product may injure susceptible plants in the immediate vicinity.~~

~~Avoid contamination of water used for domestic purposes and irrigation purposes. Excessive amounts of this product in the soil may temporarily inhibit seed germination and plant growth.~~

~~Most cases of groundwater contamination involving phenoxy herbicides such as MCPA have been associated with mixing/loading and disposal sites. Caution should be exercised when handling MCPA pesticides at such sites to prevent contamination of groundwater supplies. Use of closed systems for mixing and transferring this pesticide will reduce the probability of spills. Placement of the mixing/loading equipment on an impervious pad to contain spills will help prevent groundwater contamination.~~

## PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

## AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12



hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

Coveralls

~~Long-sleeved shirt and long pants,~~

Chemical-resistant gloves made of any waterproof material, Category E, such as barrier laminate  $\geq$  14 mils, nitrile rubber  $\geq$  14 mils, neoprene rubber  $\geq$  14 mils, or viton  $\geq$  14 mils,

~~Shoes plus socks, and~~

~~Protective eyewear.~~

#### NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses. Do not enter treated areas without protective clothing until sprays have dried.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

##### PESTICIDE STORAGE

Store in a dry location away from children, animals, foods, feeds, seeds and other agricultural chemicals. Keep container closed when not using. Do not allow water into container as this may cause deterioration of product. Handle in accordance with information given under "Precautionary Statements." Keep storage area locked when not in use.

In the event of spillage or leakage, soak up material with absorbent clay, sand, sawdust or other absorbent material. Scrape up and dispose of in accordance with information given under "Pesticide Disposal." Repackage and relabel usable product in a sound container. In case of fire or other emergency, report at once by toll-free telephone to 800-424-9300.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

##### CONTAINER DISPOSAL

**METAL CONTAINERS** - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**PLASTIC CONTAINERS** - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

#### GENERAL INFORMATION

Local conditions may affect the use of this chemical. Consult State Agricultural Extension or Experiment Station Weed Specialists for specific recommendations for local weed problems and for information on possible lower dosages. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended and other influencing factors in the use of this product are beyond the control of the seller. Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith. Do not apply this product through any type of irrigation system.

CONTROLS THESE AND OTHER WEEDS

#### SUSCEPTIBLE (MOST AREAS):

Annual sowthistle  
Beggarticks  
Cocklebur  
Dragonhead mint  
Field peppergrass  
Goatsbeard  
Hempnettle

Lambsquarters  
(goosefoot)  
Marshelder  
Mustards (annual)  
Poison hemlock  
Puncturevine  
Ragweed

Shepherdspurse  
Stinkweed  
(pennycress,  
fanweed)  
Wild radish  
Yellow rocket  
or wintercress

#### LESS SUSCEPTIBLE:

Buttercups  
Canada thistle  
Chervil  
Dandelions  
Kochia  
Miner's lettuce

Perennial sow  
Plantains  
Purslane  
Russian pigweed  
Stinging nettle

Sunflower  
Vetch  
White top or  
hoary cress

#### PREPARATION OF THE SPRAY

Fill the spray tank with half the required amount of water, then add the recommended amount of MCPA Ester 4 and continue filling the spray tank with the balance of water. Keep agitator running when filling spray tank and during spray operations. For crop uses, do not mix with oil, surfactant or other adjuvants as this may reduce selectivity to crops resulting in crop damage or kill. When cleaning equipment, do not pour washwater on the ground; spray or drain over a large area away from wells and other water sources.

Do not apply MCPA Ester 4 by aerial application in the vicinity of sugar beets. Do not apply MCPA Ester 4 around houses, recreation sites, or similar areas.

#### AMOUNT OF SPRAY TO APPLY

Apply 5 to 15 gallons of total spray per acre when making applications with ground equipment and 2 to 5 gallons of total spray per acre when making applications by aircraft unless directed otherwise under specific directions. Carefully read the Environmental Hazards section of the Precautionary Statements for further information on spray volume.

#### SPRAY DRIFT MANAGEMENT

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

Apply only as a medium or coarser spray (ASAE standard 572) or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.

Apply only when wind speed is 2-10 mph at the application site.

#### FOR AERIAL APPLICATION:

- The distance of the outer most nozzles on the boom must not exceed 75% of the wingspan or 90% rotor blade diameter.
- Release spray at the lowest height consistent with efficacy and flight safety. Do not release spray at

a height greater than 10 feet above the crop canopy.

#### FOR GROUND BOOM APPLICATION:

- Do not apply with a nozzle height greater than 4 feet above the crop canopy.

SWATH ADJUSTMENT: When applications are made with a crosswind, the swath will be displaced downward. The applicator must compensate for this displacement at the downwind edge of application area by adjusting the path of the aircraft upwind.

TEMPERATURE INVERSIONS: Do not make applications during a temperature inversion because drift potential is high.

SENSITIVE AREAS: The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitats for threatened or endangered species, non-target crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

Where states have more stringent regulations, they should be observed. The applicator should be familiar with and take into account the information covered in the Aerial Drift Reduction Advisory Information.

### AERIAL SPRAY DRIFT MANAGEMENT

#### Spray Drift Management

AVOIDING SPRAY DRIFT AT THE APPLICATION SITE IS THE RESPONSIBILITY OF THE APPLICATOR. The interaction of many equipment and weather related factors determine the potential for spray drift. The applicator is responsible for considering all these factors when making decisions.

The following drift management requirements must be followed to avoid off-target movement from aerial applications to agricultural field crops. These requirements do not apply to forestry applications, public health uses or to applications using dry formulations.

1. The distance of the outer most nozzles on the boom must not exceed  $\frac{3}{4}$  the length of the wingspan or rotor.
2. Nozzles must always point backward parallel with the air stream and never be pointed downwards more than 45 degrees.

Where states have more stringent regulations, they should be observed.

The applicator should be familiar with and take into account the information covered in the Aerial Drift Reduction Advisory.

#### Aerial Drift Reduction Advisory

[This section is advisory in nature and does not supersede the mandatory label requirements.]

#### Information on Droplet Size

The most effective way to reduce drift potential is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly, or under unfavorable environmental conditions (See Wind, Temperature and Humidity, and Temperature Inversions).

#### Controlling Droplet Size

- Volume — Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.

- **Pressure**—Do not exceed the nozzle manufacturer's recommended pressures. For many nozzle types lower pressure produces larger droplets. When higher flow rates are needed, use higher flow rate nozzles instead of increasing pressure.
- **Number of nozzles**—Use the minimum number of nozzles that provide uniform coverage.
- **Nozzle Orientation**—Orienting nozzles so that the spray is released parallel to the airstream produces larger droplets than other orientations and is the recommended practice. Significant deflection from horizontal will reduce droplet size and increase drift potential.
- **Nozzle Type**—Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low drift nozzles. Solid stream nozzles oriented straight back produce the largest droplets and the lowest drift.

#### Boom Length

For some use patterns, reducing the effective boom length to less than  $\frac{3}{4}$  of the wingspan or rotor length may further reduce drift without reducing swath width.

#### Application Height

Applications should not be made at a height greater than 10 feet above the top of the target plants unless a greater height is required for aircraft safety. Making applications at the lowest height that is safe reduces exposure of droplets to evaporation and wind.

#### Swath Adjustment

When applications are made with a crosswind, the swath will be displaced downwind. Therefore, on the up and downwind edges of the field, the applicator must compensate for this displacement by adjusting the path of the aircraft upwind. Swath adjustment distance should increase with increasing drift potential (higher wind, smaller drops, etc.)

#### Wind

Drift potential is lowest between wind speeds of 2-10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given speed. Application should be avoided below 2 mph due to variable wind direction and high inversion potential. NOTE: Local terrain can influence wind patterns. Every applicator should be familiar with local wind patterns and how they affect spray drift.

#### Temperature and Humidity

When making applications in low relative humidity, set up equipment to produce larger droplets to compensate for evaporation. Droplet evaporation is most severe when conditions are both hot and dry.

#### Temperature Inversions

Applications should not occur during a temperature inversion because drift potential is high. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions. Temperature inversions are characterized by increasing temperatures with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

#### Sensitive Areas

The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g. when wind is blowing away from the sensitive areas).



## WHEAT, OATS, BARLEY AND RYE:

Apply as a water mix spray by ground sprayer or airplane. Use 1/2 to 1 pint per acre for the more susceptible weeds after crop has reached the 3 to 4 leaf stage up to boot stage. Use up to 3 1 2/3 pints per acre for the less susceptible weeds after crop has tillered and up to early boot stage.

Do not spray from boot to dough stage.

Do not forage or graze meat animals on treated areas within 7 days of slaughter.

Do not forage or graze dairy animals on treated areas within 7 days after treatment.

Do not apply more than 1 2/3 pints (0.75 lb acid equivalent) per acre per year

## FLAX:

Use 1/4 to 1/2 pint per acre. Apply by ground sprayer or by airplane. Apply only when weeds are up and when flax is 4 to 8 inches high and before it comes into bud. Treatment after early bud stage may result in severe damage. If Canada thistle is present, it may be necessary to go as high as 3/4 1/2 pint per acre to prevent seed head production. Some injury to the flax may result.

Do not forage or graze meat animals on treated areas within 7 days of slaughter.

Do not forage or graze dairy animals on treated areas within 7 days after treatment.

Do not apply more than 1/2 pints (0.25 lb acid equivalent) per acre per year

## GRASSES

### ESTABLISHED GRASSLAND PASTURE/RANGELAND:

Use 1 to 3 pints per acre. Apply by ground sprayer in not less than 5 gallons or by airplane in not less than two gallons total spray volume. Use higher rate for White Top, Canada thistle and other less susceptible weeds. Spray perennials in early bud to full bloom stage and regrowth in fall; other weeds in spring or fall, when actively growing.

Do not forage or graze meat animals on treated areas within 7 days of slaughter.

Do not forage or graze dairy animals on treated areas within 7 days after treatment.

Do not apply more than 3 1/4 pints (1.5 lb acid equivalent) per acre per year

Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.

### GRASSES GROWN FOR SEED: (aerial and surface applications):

Use 1 to 2 pints per acre, the higher rate where weed stands are heavy. In established grasses, apply in spring before head comes into boot and on seedling grass after grass has tillered.

Note: For weed control in grasses, repeated treatment may be needed for less susceptible weeds. In some areas bent, buffalo, carpet and St. Augustine grasses may also be injured by treatment.

Do not apply more than 3 1/4 pints (1.5 lb acid equivalent) per acre per year

Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.



~~NON-CROP SPRAYING ALONG FENCE ROWS AND ROADSIDES:~~ (In non-crop areas such as Roadsides, Fence Rows, Rights-of-Way and similar places to control Canada Thistle, White Top And Meadow Buttercup)

For spot treatment, use 1/4 pint in 3 to 4 gallons of water. ~~or 3/4 gallon per acre in sufficient water to give coverage for most extensive areas.~~ Spray to wet weeds thoroughly when in bud to early bloom and again on fall regrowth.

Do not apply more than 6 1/2 pints (3.0 lb acid equivalent) per acre per year.

For broadcast treatment apply 2 to 3 pints per acre in sufficient water to give coverage for most extensive areas. Spray to wet weeds thoroughly when in bud to early bloom and again on fall regrowth.

Do not apply more than 3 1/4 pints (1.5 lb acid equivalent) per acre per year.

Do not forage or graze livestock or dairy animals on treated areas within 7 days of treatment.

#### GOLF COURSES:

For controlling whitetop, dandelions and similar weeds, apply 1 to 2 pints per acre in sufficient water to provide thorough coverage. Treatment may reduce stands of clover which may be present. Do not apply to newly seeded turf until grass has become well established. MCPA may injure bent or other creeping grass types. For best result treat thistles when in the early bud stage.

Do not apply more than 3 pints (1.5 lb acid equivalent) per acre per year.

Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.

#### SOD FARMS:

For broadcast application, apply 1 to 3 pints per acre in a spray volume of 10 to 100 gallons of water. Use the higher rate for heavy infestations or less susceptible weed species. For best results, apply in spring or fall when weeds are rapidly growing and do not mow for 2 days before or after application. For spot treatment in small areas, use 1 fluid ounce per 1000 square feet in 1 to 3 gallons of spray and apply uniformly.

NOTE: Repeat applications may be required for less susceptible weeds. In some areas, bent, buffalo, carpet and St. Augustine grasses may also be injured.

Do not apply more than 3 1/4 pints (1.5 lb acid equivalent) per acre per year.

Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.

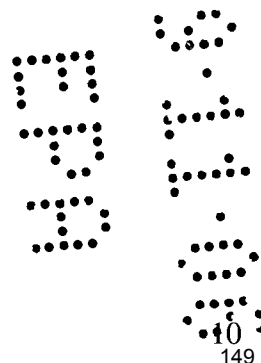
#### CONDITIONS OF SALE AND WARRANTY

The DIRECTIONS FOR USE of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of ALBAUGH, INC., its

Supplemental Distributors, or the Seller. All such risks shall be assumed by the Buyer.

ALBAUGH, INC., its Supplemental Distributors and the Seller warrant that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use subject to the inherent risks referred to above. NEITHER ALBAUGH, INC. NOR ITS SUPPLEMENTAL DISTRIBUTORS MAKE ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS FOR ANY PARTICULAR PURPOSE OR OF MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS.

BUYER'S EXCLUSIVE REMEDY AND THE EXCLUSIVE LIABILITY OF ALBAUGH, INC., ITS SUPPLEMENTAL DISTRIBUTORS AND THE SELLER FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF OR THE REPAYMENT OF THE PURCHASE PRICE FOR THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. When Buyer suffers losses or damages resulting from the use or handling of this product (including claims based on contract, negligence, strict liability, or other legal theories), Buyer must promptly notify Seller in writing of any claims to be eligible to receive either remedy stated above. IN NO CASE SHALL ALBAUGH, INC., ITS SUPPLEMENTAL DISTRIBUTORS, OR THE SELLER BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. ALBAUGH, INC., its Supplemental Distributors, and the Seller offer this product, and the Buyer accepts it, subject to the foregoing Conditions of Sale and Warranty, which may be varied only by agreement in writing signed by a duly authorized representative of ALBAUGH, INC. No employee or agent of ALBAUGH, INC., its Supplemental Distributor, or the Seller is authorized to vary or exceed the terms of this Warranty in any other manner.



## ALBAUGH MCPA ESTER 4

HERBICIDE FOR SELECTIVE CONTROL OF CERTAIN WEEDS  
IN WHEAT, OATS, BARLEY, RYE, GRASSLAND AND IN NON-CROP AREAS

### ACTIVE INGREDIENT:

2-ethylhexyl ester of 2-methyl-4-chlorophenoxyacetic acid\* ..... 69.7%

OTHER INGREDIENTS†: ..... 30.3%

TOTAL.....100.0%

\*Equivalent to 44.7% of 2-methyl-4-chlorophenoxyacetic acid isomer specific of not less than 3.7 pounds of 2-methyl-4-chlorophenoxyacetic acid isomer specific per gallon at 68°F. Isomer specific by AOAC Method.

†Contains petroleum distillates.

KEEP OUT OF REACH OF CHILDREN

### CAUTION

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none"><li>• Immediately call a poison control center or doctor.</li><li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li><li>• Do not give any liquid to the person.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
IF INHALED:	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
Contains petroleum distillate - vomiting may cause aspiration pneumonia.	

See inside booklet for additional Precautionary Statements.

EPA Reg. No. 42750-23

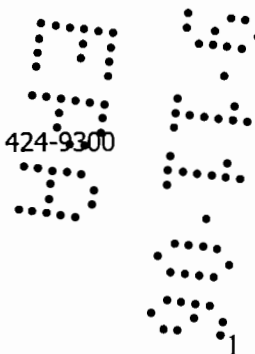
EPA Est. No. 42750-MO-001

NET CONTENTS:

### MANUFACTURED BY:

Albaugh, Inc.  
Ankeny, Iowa 50021

FOR CHEMICAL SPILL, LEAK, FIRE, OR EXPOSURE CALL CHEMTREC (800) 424-9300



PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin, eyes or clothing. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

PERSONAL PROTECTIVE EQUIPMENT

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for Category E on an EPA chemical-resistance category selection chart.

Mixers, loaders, applicators, flaggers and other handlers must wear:

- Long-sleeved shirt and long pants,
- Chemical-resistant gloves when mixing, loading, or using any hand-held equipment.
- Shoes plus socks, and
- Protective eyewear.

Additional PPE requirements for mixers and loaders supporting aerial application to rangelands, pasture lands, or noncropland. These mixers/loaders also must wear:

- A chemical resistant apron, and
- A NIOSH-approved respirator with a dist/mist filter with MSHA/NIOSH approval number prefix TC-21C or any N<sup>2</sup>, R, P, or HE filter.

See engineering controls for additional requirements.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENGINEERING CONTROLS

Pilots must use an enclosed cockpit that meets the requirements listed in the WPS for agricultural pesticides [40 CFR 170.240(d)(6)]

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

## ENVIRONMENTAL HAZARDS

This pesticide may be toxic to fish, aquatic invertebrates and aquatic plants. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Runoff of this product will be reduced by avoiding applications when rainfall is forecasted to occur within 48 hours.

This chemical has properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

## PHYSICAL AND CHEMICAL HAZARDS

Do not use or store near heat or open flame.

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

### AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is:

- Coveralls
- Chemical-resistant gloves made of any waterproof material
- Shoes plus socks

### NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses. Do not enter treated areas without protective clothing until sprays have dried.



#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

##### PESTICIDE STORAGE

Store in a dry location away from children, animals, foods, feeds, seeds and other agricultural chemicals. Keep container closed when not using. Do not allow water into container as this may cause deterioration of product. Handle in accordance with information given under "Precautionary Statements." Keep storage area locked when not in use.

In the event of spillage or leakage, soak up material with absorbent clay, sand, sawdust or other absorbent material. Scrape up and dispose of in accordance with information given under "Pesticide Disposal." Repackage and relabel usable product in a sound container. In case of fire or other emergency, report at once by toll-free telephone to 800-424-9300.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

##### CONTAINER DISPOSAL

**METAL CONTAINERS** - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

**PLASTIC CONTAINERS** - Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

#### GENERAL INFORMATION

Local conditions may affect the use of this chemical. Consult State Agricultural Extension or Experiment Station Weed Specialists for specific recommendations for local weed problems and for information on possible lower dosages. Follow directions carefully. Timing and method of application, weather and crop conditions, mixtures with other chemicals not specifically recommended and other influencing factors in the use of this product are beyond the control of the seller. Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herewith. Do not apply this product through any type of irrigation system.

#### CONTROLS THESE AND OTHER WEEDS

##### SUSCEPTIBLE (MOST AREAS):

Annual sowthistle  
Beggarticks  
Cocklebur  
Dragonhead mint  
Field peppergrass  
Goatsbeard  
Hempnettle

Lambsquarters  
(goosefoot)  
Marshelder  
Mustards (annual)  
Poison hemlock  
Puncturevine  
Ragweed

Shepherdspurse  
Stinkweed  
(pennycress,  
fanweed)  
Wild radish  
Yellow rocket  
or wintercress

##### LESS SUSCEPTIBLE:

Buttercups  
Canada thistle  
Chervil  
Dandelions  
Kochia  
Miner's lettuce

Perennial sow  
Plantains  
Purslane  
Russian pigweed  
Stinging nettle

Sunflower  
Vetch  
White top or  
hoary cress



## PREPARATION OF THE SPRAY

Fill the spray tank with half the required amount of water, then add the recommended amount of MCPA Ester 4 and continue filling the spray tank with the balance of water. Keep agitator running when filling spray tank and during spray operations. For crop uses, do not mix with oil, surfactant or other adjuvants as this may reduce selectivity to crops resulting in crop damage or kill. When cleaning equipment, do not pour washwater on the ground; spray or drain over a large area away from wells and other water sources.

Do not apply MCPA Ester 4 by aerial application in the vicinity of sugar beets. Do not apply MCPA Ester 4 around houses, recreation sites, or similar areas.

## AMOUNT OF SPRAY TO APPLY

Apply 5 to 15 gallons of total spray per acre when making applications with ground equipment and 2 to 5 gallons of total spray per acre when making applications by aircraft unless directed otherwise under specific directions. Carefully read the Environmental Hazards section of the Precautionary Statements for further information on spray volume.

## SPRAY DRIFT MANAGEMENT

Avoiding spray drift at the application site is the responsibility of the applicator. The interaction of many equipment-and-weather related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions.

Apply only as a medium or coarser spray (ASAE standard 572) or a volume mean diameter of 300 microns or greater for spinning atomizer nozzles.

Apply only when wind speed is 2-10 mph at the application site.

### FOR AERIAL APPLICATION:

- The distance of the outer most nozzles on the boom must not exceed 75% of the wingspan or 90% rotor blade diameter.
- Release spray at the lowest height consistent with efficacy and flight safety. Do not release spray at a height greater than 10 feet above the crop canopy.

### FOR GROUND BOOM APPLICATION:

- Do not apply with a nozzle height greater than 4 feet above the crop canopy.

**SWATH ADJUSTMENT:** When applications are made with a crosswind, the swath will be displaced downward. The applicator must compensate for this displacement at the downwind edge of application area by adjusting the path of the aircraft upwind.

**TEMPERATURE INVERSIONS:** Do not make applications during a temperature inversion because drift potential is high.

**SENSITIVE AREAS:** The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g. residential areas, bodies of water, known habitats for threatened or endangered species, non-target crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

Where states have more stringent regulations, they should be observed. The applicator should be

familiar with and take into account the information covered in the Aerial Drift Reduction Advisory Information.

#### WHEAT, OATS, BARLEY AND RYE:

Apply as a water mix spray by ground sprayer or airplane. Use 1/2 to 1 pint per acre for the more susceptible weeds after crop has reached the 3 to 4 leaf stage up to boot stage. Use up to 3  $1\frac{2}{3}$  pints per acre for the less susceptible weeds after crop has tillered and up to early boot stage.

Do not spray from boot to dough stage.

Do not forage or graze meat animals on treated areas within 7 days of slaughter.

Do not forage or graze dairy animals on treated areas within 7 days after treatment.

Do not apply more than 1  $\frac{2}{3}$  pints (0.75 lb acid equivalent) per acre per year

#### FLAX:

Use 1/4 to 1/2 pint per acre. Apply by ground sprayer or by airplane. Apply only when weeds are up and when flax is 4 to 8 inches high and before it comes into bud. Treatment after early bud stage may result in severe damage. If Canada thistle is present, it may be necessary to go as high as  $\frac{3}{4}$   $\frac{1}{2}$  pint per acre to prevent seed head production. Some injury to the flax may result.

Do not forage or graze meat animals on treated areas within 7 days of slaughter.

Do not forage or graze dairy animals on treated areas within 7 days after treatment.

Do not apply more than 1/2 pints (0.25 lb acid equivalent) per acre per year

### GRASSES

#### ESTABLISHED PASTURE/RANGELAND:

Use 1 to 3 pints per acre. Apply by ground sprayer in not less than 5 gallons or by airplane in not less than two gallons total spray volume. Use higher rate for White Top, Canada thistle and other less susceptible weeds. Spray perennials in early bud to full bloom stage and regrowth in fall; other weeds in spring or fall, when actively growing.

Do not forage or graze meat animals on treated areas within 7 days of slaughter.

Do not forage or graze dairy animals on treated areas within 7 days after treatment.

Do not apply more than 3  $\frac{1}{4}$  pints (1.5 lb acid equivalent) per acre per year

Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.

#### GRASSES GROWN FOR SEED: (aerial and surface applications):

Use 1 to 2 pints per acre, the higher rate where weed stands are heavy. In established grasses, apply in spring before head comes into boot and on seedling grass after grass has tillered.

Note: For weed control in grasses, repeated treatment may be needed for less susceptible weeds. In some areas bent, buffalo, carpet and St. Augustine grasses may also be injured by treatment.

Do not apply more than 3  $\frac{1}{4}$  pints (1.5 lb acid equivalent) per acre per year

Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.



NON-CROP SPRAYING (In non-crop areas such as Roadsides, Fence Rows, Rights-of-Way and similar places to control Canada Thistle, White Top And Meadow Buttercup)

For spot treatment, use 1/4 pint in 3 to 4 gallons of water. Spray to wet weeds thoroughly when in bud to early bloom and again on fall regrowth.

Do not apply more than 6 1/2 pints (3.0 lb acid equivalent) per acre per year.

For broadcast treatment apply 2 to 3 pints per acre in sufficient water to give coverage for most extensive areas. Spray to wet weeds thoroughly when in bud to early bloom and again on fall regrowth.

Do not apply more than 3 1/4 pints (1.5 lb acid equivalent) per acre per year.

Do not forage or graze livestock or dairy animals on treated areas within 7 days of treatment.

#### GOLF COURSES:

For controlling whitetop, dandelions and similar weeds, apply 1 to 2 pints per acre in sufficient water to provide thorough coverage. Treatment may reduce stands of clover which may be present. Do not apply to newly seeded turf until grass has become well established. MCPA may injure bent or other creeping grass types. For best result treat thistles when in the early bud stage.

Do not apply more than 3 pints (1.5 lb acid equivalent) per acre per year.

Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.

#### SOD FARMS:

For broadcast application, apply 1 to 3 pints per acre in a spray volume of 10 to 100 gallons of water. Use the higher rate for heavy infestations or less susceptible weed species. For best results, apply in spring or fall when weeds are rapidly growing and do not mow for 2 days before or after application. For spot treatment in small areas, use 1 fluid ounce per 1000 square feet in 1 to 3 gallons of spray and apply uniformly.

NOTE: Repeat applications may be required for less susceptible weeds. In some areas, bent, buffalo, carpet and St. Augustine grasses may also be injured.

Do not apply more than 3 1/4 pints (1.5 lb acid equivalent) per acre per year.

Do not apply more than 2 applications per year with a minimum retreatment interval of 21 days.

#### CONDITIONS OF SALE AND WARRANTY

The DIRECTIONS FOR USE of this product reflect the opinion of experts based on field use and tests. The directions are believed to be reliable and should be followed carefully. However, it is impossible to eliminate all risks inherently associated with use of this product. Crop injury, ineffectiveness, or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of ALBAUGH, INC., its Supplemental Distributors, or the Seller. All such risks shall be assumed by the Buyer.

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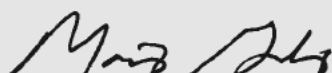
**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**401 M Street, S.W.**  
**WASHINGTON, DC 20460**

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**DATA MATRIX**

<b>Date:</b> 9/8/06	<b>EPA Reg. No./File Symbol</b> 42750-23	Page 1 of 5
<b>Applicant's/Registrant's Name &amp; Address:</b> Albaugh Inc. 121 NE 18 <sup>th</sup> St. Ankeny, IA 50021	<b>Product:</b> <b>MCPA Ester 4</b>	

**Ingredient:** MCPA 2-ethylhexyl ester CAS # 26544-20-7

Guideline Reference	Guideline Study Name	MRID Number	Submitter	Status	Note
			Albaugh	OWN	
			Albaugh	OWN	
					Waiver <sup>2</sup>
			Albaugh	OWN	
			Albaugh	OWN	
					Not req'd <sup>1</sup>
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
			Albaugh	OWN	
					Not req'd <sup>1</sup>
			Albaugh	OWN	
			Albaugh	OWN	
					Waiver <sup>3</sup>
					In progress <sup>4</sup>
Signature			Name and Title: Morris Gaskins Registrations Manager		Date: 9/8/06

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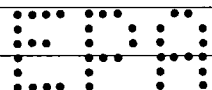
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					Waiver <sup>6</sup>
			Albaugh	OWN	
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			<b>Signature</b> 		<b>Name and Title:</b> Morris Gaskins Registrations Manager
					<b>Date:</b> 9/8/06

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
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**Ingredient:** MCPA 2-ethylhexyl ester CAS # 26544-20-7

Guideline Reference Number	Guideline Study Name	MRID	Submitter (EPA Co. No.)	Status	Note
<b>MCPA generic data requirements</b>					
Albaugh will make offers-to-pay to the following companies that appear on the data submitters list as of March 31, 2006					
			Nufarm Americas (228)	PAY	
			PBI Gordon (2217)	PAY	
			Institute of Ind Organic Chem (71917)	PAY	
			Spray Drift Task Force (66607)	PAY	
			Outdoor Resident Exposure TF (71754)	PAY	
			Ag Reentry Task Force (71755)	PAY	
			Ag Handlers Exposure TF (75234)	PAY	
<b>Signature</b> 			<b>Name and Title:</b> Morris Gaskins Registrations Manager		<b>Date:</b> 9/8/06

## Footnotes for MCPA Ester 4 Data Matrix

### Footnote 1

- 830.6313 Stability to Normal and Elevated Temperature, Metals, and Metal Ions
- 830.1700 Preliminary analysis
- 830.7050 UV/Visible absorption
- 830.7200 Melting Point
- 830.7220 Boiling Point
- 830.7370 Dissociation Constants in Water
- 830.7550 Partition coefficient
- 830.7560 Partition coefficient
- 830.7570 Partition coefficient
- 830.7840 Water solubility
- 830.7860 Water solubility
- 830.7950 Vapor Pressure



This data is not required for end use products per Product Properties Test Guidelines OPPTS 830.1000 (e)(2)(xi)(B) Table 2

### Footnote 2

- 830.1620 Production Process . Albaugh requests a waiver for this data requirement. MCPA Ester 4 product is formulated. See Guideline 830.1650.

### Footnote 3

- 830.6316 Explodibility. Albaugh requests a waiver for this data requirement. MCPA Ester 4 product is not composed of explosive components and therefore does not exhibit explosive characteristics.

### Footnote 4

- 830.6317 Storage stability
- 830.6320 Corrosion characteristics

Albaugh is currently conducting combined testing for these guidelines as allowed by OPPTS Product Properties Test Guidelines. Albaugh will submit these studies upon completion of the Storage Stability one year after initiation and requests that a conditional registration be granted prior to submission of the data.

### Footnote 5

- 830.6319 Miscibility. Albaugh requests a waiver for this data requirement. MCPA Ester 4 is not intended to be diluted with oil or other non-polar solvents.

### Footnote 6

- 830.6321 Dielectric breakdown voltage. Albaugh requests a waiver for this data requirement. MCPA Ester 4 is not labeled or intended for use around electrical equipment.



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**WASHINGTON, DC 20460**

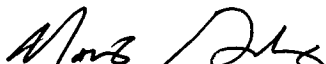
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**DATA MATRIX**

<b>Date:</b> 9/8/06	<b>EPA Reg. No./File Symbol</b> 42750-23	Page 1 of 5
<b>Applicant's/Registrant's Name &amp; Address:</b> Albaugh Inc. 121 NE 18 <sup>th</sup> St. Ankeny, IA 50021	<b>Product:</b> <b>MCPA Ester 4</b>	

**Ingredient:** MCPA 2-ethylhexyl ester CAS # 26544-20-7

Guideline Reference	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	With application	Albaugh	OWN	
830.1600	Description of Materials Used to Produce the	With application	Albaugh	OWN	
830.1620	Description of Production Process				Waiver <sup>2</sup>
830.1650	Description of Formulation Process	With application	Albaugh	OWN	
830.1670	Description of Formation of Impurities	With application	Albaugh	OWN	
830.1700	Preliminary Analysis				Not req'd <sup>1</sup>
830.1750	Certified Limits	With application	Albaugh	OWN	
830.1800	Enforcement Analytical Method	With application	Albaugh	OWN	
830.6302	Color	With application	Albaugh	OWN	
830.6303	Physical State	With application	Albaugh	OWN	
830.6304	Odor	With application	Albaugh	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions				Not req'd <sup>1</sup>
830.6314	Oxidation/Reduction: Chemical Incompatibility	With application	Albaugh	OWN	
830.6315	Flammability	With application	Albaugh	OWN	
830.6316	Explosibility				Waiver <sup>3</sup>
830.6317	Storage Stability				In progress <sup>4</sup>

<b>Signature</b> 	<b>Name and Title:</b> Morris Gaskins Registrations Manager	<b>Date:</b> 9/8/06
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**WASHINGTON, DC 20460**

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**DATA MATRIX**

**Date:** 9/8/06


**EPA Reg. No./File Symbol** 42750-23

Page 2 of 5

**Applicant's/Registrant's Name & Address:** Albaugh Inc.  
 121 NE 18<sup>th</sup> St.  
 Ankeny, IA 50021

**Product:**  
**MCPA Ester 4**

**Ingredient:** MCPA 2-ethylhexyl ester CAS # 26544-20-7

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6319	Miscibility				Waiver <sup>5</sup>
830.6320	Corrosion Characteristics				In progress <sup>4</sup>
830.6321	Dielectric Breakdown Voltage				Waiver <sup>6</sup>
830.7000	pH	With application	Albaugh	OWN	
830.7050	UV/Visible Absorption				Not req'd <sup>1</sup>
830.7100	Viscosity	With application	Albaugh	OWN	
830.7200	Melting Point/Melting Range				Not req'd <sup>1</sup>
830.7220	Boiling Point/Boiling Range				Not req'd <sup>1</sup>
830.7300	Density/Relative Density/Bulk Density	With application	Albaugh	OWN	
830.7370	Dissociation Constants in Water				Not req'd <sup>1</sup>
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method				Not req'd <sup>1</sup>
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				Not req'd <sup>1</sup>
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				Not req'd <sup>1</sup>
<b>Signature</b> 			<b>Name and Title:</b> Morris Gaskins Registrations Manager		<b>Date:</b> 9/8/06

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**DATA MATRIX**

<b>Date:</b> 9/8/06	<b>EPA Reg. No./File Symbol</b> 42750-23	Page 3 of 5
<b>Applicant's/Registrant's Name &amp; Address:</b> Albaugh Inc. 121 NE 18 <sup>th</sup> St. Ankeny, IA 50021	<b>Product:</b> <b>MCPA Ester 4</b>	

**Ingredient:** MCPA 2-ethylhexyl ester CAS # 26544-20-7

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Water Solubility: Column Elution Method; Shake Flask Method				Not req'd <sup>1</sup>
830.7860	Water Solubility, Generator Column Method				Not req'd <sup>1</sup>
830.7950	Vapor Pressure				Not req'd <sup>1</sup>
870.1100	Acute Oral Toxicity - Rat	41992301	Albaugh	OWN	
870.1200	Acute Dermal Toxicity - Rat	41992301	Albaugh	OWN	
870.1300	Acute Inhalation Toxicity - Rat	41992301	Albaugh	OWN	
870.2400	Primary Eye Irritation - Rabbit	41992301	Albaugh	OWN	
870.2500	Primary Dermal Irritation	41992301	Albaugh	OWN	
870.2600	Dermal Sensitization	41992301	Albaugh	OWN	
<b>Signature</b>			<b>Name and Title:</b> Morris Gaskins Registrations Manager		<b>Date:</b> 9/8/06


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**DATA MATRIX**

<b>Date:</b> 9/8/06	<b>EPA Reg. No./File Symbol</b> 42750-23	Page 5 of 5
<b>Applicant's/Registrant's Name &amp; Address:</b> Albaugh Inc. 121 NE 18 <sup>th</sup> St. Ankeny, IA 50021	<b>Product:</b> <b>MCPA Ester 4</b>	

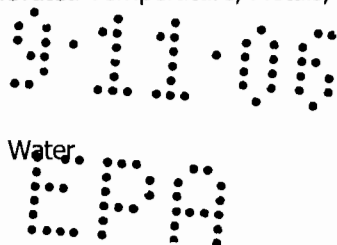
**Ingredient:** MCPA 2-ethylhexyl ester CAS # 26544-20-7

Guideline Reference Number	Guideline Study Name	MRID	Submitter (EPA Co. No.)	Status	Note
<b>MCPA generic data requirements</b>					
Albaugh will make offers-to-pay to the following companies that appear on the data submitters list as of March 31, 2006					
MCPA Generic Data	Cite-All		Nufarm Americas (228)	PAY	
MCPA Generic Data	Cite-All		PBI Gordon (2217)	PAY	
MCPA Generic Data	Cite-All		Institute of Ind Organic Chem (71917)	PAY	
MCPA Generic Data	Cite-All		Spray Drift Task Force (66607)	PAY	
MCPA Generic Data	Cite-All		Outdoor Resident Exposure TF (71754)	PAY	
MCPA Generic Data	Cite-All		Ag Reentry Task Force (71755)	PAY	
MCPA Generic Data	Cite-All		Ag Handlers Exposure TF (75234)	PAY	
<b>Signature</b> 			<b>Name and Title:</b> Morris Gaskins Registrations Manager		<b>Date:</b> 9/8/06

## Footnotes for MCPA Ester 4 Data Matrix

### Footnote 1

- 830.6313 Stability to Normal and Elevated Temperature, Metals, and Metal Ions
- 830.1700 Preliminary analysis
- 830.7050 UV/Visible absorption
- 830.7200 Melting Point
- 830.7220 Boiling Point
- 830.7370 Dissociation Constants in Water
- 830.7550 Partition coefficient
- 830.7560 Partition coefficient
- 830.7570 Partition coefficient
- 830.7840 Water solubility
- 830.7860 Water solubility
- 830.7950 Vapor Pressure



This data is not required for end use products per Product Properties Test Guidelines OPPTS 830.1000 (e)(2)(xi)(B) Table 2

### Footnote 2

- 830.1620 Production Process . Albaugh requests a waiver for this data requirement. MCPA Ester 4 product is formulated. See Guideline 830.1650.

### Footnote 3

- 830.6316 Explodibility. Albaugh requests a waiver for this data requirement. MCPA Ester 4 product is not composed of explosive components and therefore does not exhibit explosive characteristics.

### Footnote 4

- 830.6317 Storage stability
- 830.6320 Corrosion characteristics

Albaugh is currently conducting combined testing for these guidelines as allowed by OPPTS Product Properties Test Guidelines. Albaugh will submit these studies upon completion of the Storage Stability one year after initiation and requests that a conditional registration be granted prior to submission of the data.

### Footnote 5

- 830.6319 Miscibility. Albaugh requests a waiver for this data requirement. MCPA Ester 4 is not intended to be diluted with oil or other non-polar solvents.

### Footnote 6

- 830.6321 Dielectric breakdown voltage. Albaugh requests a waiver for this data requirement. MCPA Ester 4 is not labeled or intended for use around electrical equipment.



United States Environmental Protection  
Agency Washington, D.C. 20460

OMB Approval 2070-0107  
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.  
Use additional sheet(s) if necessary.

1. Company Name and Address ALBAUGH INC PO Box 2127 VALDOSTA, GA 316042127	2. Case # and Name  EPA Reg. No. 42750-23 (MCPA Ester 4)	3. Date and Type of DCI and Number 02-Mar-2006 PRODUCT SPECIFIC ID # PDCI-030564-24958
---	--	---

4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
	<b>Product Chemistry Data Requirements (Conventional Chemical)</b>								
830.1550	Product Identity and composition (1)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	1
830.1600	Description of materials used to produce the product (2)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	1
830.1620	Description of production process (3)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI	8	8
830.1650	Description of formulation process (4)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	1
830.1670	Discussion of formation of impurities (5)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	1
830.1700	Preliminary analysis (6, 7, 8)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI	8	8
830.1750	Certified limits (9, 10)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	1
830.1800	Enforcement analytical method (11)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	1
830.6302	Color (12)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	1
830.6303	Physical state (13)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	1

10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law

Signature and Title of Company's Authorized Representative

*[Signature]* Registrations Mgr.  
Albaugh, Inc.

11. Date

3/29/06

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12. Name of Company

13. Phone Number (229) 244-3288



United States Environmental Protection  
Agency Washington, D.C. 20460

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OMB Approval 2070-0057

**REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE**

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1. Company Name and Address ALBAUGH INC PO Box 2127 VALDOSTA, GA 316042127	2. Case # and Name  EPA Reg. No. 42750-23	3. Date and Type of DCI and Number 02-Mar-2006 PRODUCT SPECIFIC ID # PDCI-030564-24958
---	---	---

4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
830.6304	Odor (14)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	1
830.6313	Stability to sunlight, normal and elevated temperatures, metals, and metal ions (15, 16)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI	8	8
830.6314	Oxidizing or reducing action (17)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	1
830.6315	Flammability (18)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	1
830.6316	Explosibility (19)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	8
830.6317	Storage stability of product (20)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	1
830.6319	Miscibility (21)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	8
830.6320	Corrosion characteristics (22)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	1
830.6321	Dielectric breakdown voltage (23)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	8
830.7000	pH of water solutions or suspensions (24, 25)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	1
830.7050	UV/Visible absorption					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/PAI	8	8

Initial to indicate certification as to information on this page  
(full text of certification is on page one).

*MP*

Date

3/29/06

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4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
830.7100	Viscosity (26)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	1
830.7200	Melting point/melting range (27, 28)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI	8	8
830.7220	Boiling point/boiling range (29, 30)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI	8	8
830.7300	Density/relative density (31, 32)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	1
830.7370	Dissociation constant in water (33, 34)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI or PAI	8	8
830.7520	Particle size, fiber length, and diameter distribution (35)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI or PAI	8	8
830.7550	Partition coefficient (n-octanol/water), shake flask method (36)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/PAI	8	8
830.7570	Partition coefficient (n-octanol/water), estimation by liquid chromatography (37)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/PAI	8	8
830.7840	Water solubility: Column elution method, shake flask method (38)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI or PAI	8	8
830.7950	Vapor pressure (39, 40)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI or PAI	8	8
<u>Toxicology Data Requirements (Conventional Chemical)</u>									
Initial to indicate certification as to information on this page (full text of certification is on page one).							Date	3/29/06	170



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**REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE**

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1. Company Name and Address ALBAUGH INC PO Box 2127 VALDOSTA, GA 316042127		2. Case # and Name  EPA Reg. No. 42750-23			3. Date and Type of DCI and Number 02-Mar-2006 PRODUCT SPECIFIC ID # PDCI-030564-24958				
4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
870.1100	Acute Oral Toxicity (41)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI, EP, dilute EP?	8	6
870.1200	Acute dermal toxicity (42, 43)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI, EP, dilute EP?	8	6
870.1300	Acute inhalation toxicity (44)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI & EP	8	6
870.2400	Acute eye irritation (45)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI & EP	8	6
870.2500	Acute dermal irritation (46, 47)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI & EP	8	6
870.2600	Skin sensitization (48, 49)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI & EP	8	6
Initial to indicate certification as to information on this page (full text of certification is on page one).									
						Date 3/29/06		171	

**PRODUCT REREGISTRATION**  
**SUPPORTING DOCUMENTATION**

**FOR**

Case Name: MCPA

Reg. No. 42750-23

This supporting documentation (in chronological order) includes:

- ☒ Old labels (identified as "Superceded by label dated xx/xx/xx")
- ☐ Unacceptable CSFs (marked "Not Acceptable" and dated)
- ☒ Product chemistry reviews
- ☐ Acute Toxicity reviews
- ☐ Efficacy reviews (if necessary)
- ☐ 90-day responses to PDCI (Form A and Form B)
- ☒ Administrative forms (Application for Reregistration, Certification to Data Citation, Data Matrix)
- ☒ Correspondence



